

RIVERINA BATTERY ENERGY STORAGE SYSTEM

Stage 2a

DARLINGTON POINT SOLAR FARM

STATE SIGNIFICANT DEVELOPMENT (SSD 8392)

INDEPENDENT ENVIRONMENTAL AUDIT



Auditee: Consolidated Power Projects

Auditor: Urban Perspectives Environmental Solutions

JANUARY 2023

Document Control

This Independent Environmental Audit report has been certified by Stuart Wilmot, Principal Auditor (Exemplar Global), assisted by Wassef Hussain, Assisting Auditor (Exemplar Global) of Urban Perspectives Environmental Solutions.

DOCUMENT CONTROL STATUS					
Report Title		Independent Audit 1 – Post Approval Requirements Riverina Battery Energy Storage System (BESS)			
Document ID			Project Number	434	
Applicant		Tesla Motors Pty Ltd	Client Contact	Luke Perabo, Project Manager, CPP	
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Rev	Date	Rev Details	Author	Reviewer	Approver
1	17/10/22	Draft	Stuart Wilmot Wassef Hussain	Luke Perabo	
2	4/11/22	Final	Wassef Hussain	Stuart Wilmot	Stuart Wilmot
3	31/01/23	Addressing DPIE comments issued in Dec 2022	Wassef Hussain	Stuart Wilmot	Stuart Wilmot

Disclaimer

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The report is based on matters which were observed or came to the attention of Urban Perspectives' auditors during the day. Findings and observations arising from the independent audit are stated in the report and are based on viewed site conditions and information provided by Consolidated Power Projects (CPP).

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Glossary

Term	Definition
<i>AES</i>	Accommodation and Employment Strategy
<i>BESS</i>	Battery Energy Storage System, consisting of individual power pack cubicles or skid-mounted/containerised power packs and modular inverters and medium voltage transformers, including a connection to the above switchyard (located within substation compound areas).
<i>CEMP</i>	<p>Construction Environmental Management Plan, also referred to as the Project Environmental Management Strategy (EMS) prepared by CPP and approved by DPIE for BESS.</p> <p>CEMP in conjunction with the following plans:</p> <ul style="list-style-type: none"> - Accommodation and Employment Strategy (AES), BESS - Biodiversity Management Plan, - Traffic Management Plan, BESS - Chance Find Protocol (Signal Energy); - Emergency Management Plan; - Community Consultation and Engagement Plan (Edify) - CPP Policies and Procedures
<i>Conditions of Consent</i>	<p>Means conditions imposed on either of the following:</p> <ul style="list-style-type: none"> • development consents for State significant development • infrastructure approvals for State significant infrastructure • transitional Part 3A project approvals • other approvals or consents granted by the Minister <p>in accordance with the NSW Environmental Planning and Assessment Act 1979.</p>
<i>Conditions of Consent (Modification)</i>	Consolidated Consent for Modification 1 dated 22 October 2021
<i>Construction</i>	As defined within the relevant consent/approval.
<i>CC</i>	Construction Certificate
<i>CPP</i>	Consolidated Power Projects Pty Ltd – Contractor for the BESS, Principal Contractor, and design and construction balance of plant.
<i>Development</i>	Darlington Point Solar Farm Stage 2a – Battery Energy Storage System
<i>DP</i>	Darlington Point
<i>DPI</i>	Department of Primary Industries
<i>DPIE</i>	Department of Planning, Infrastructure and Environment
<i>DPSF</i>	Darlington Point Solar Farm, the project.
<i>Edify Energy</i>	Principal – Developer and Owner of assets
<i>EIS</i>	Environmental Impact Statement prepared by ARUP in accordance with Part 4 of the NSW Environmental Planning and Assessment Act 1979 (EP& Act) and Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).
<i>EMP</i>	Environmental Management Plan
<i>EPA</i>	NSW Environment Protection Authority
<i>FRNSW</i>	Fire and Rescue New South Wales
<i>HSE</i>	Health, Safety and Environment
<i>IEA</i>	Independent Environmental Audit

Term	Definition
<i>Incident</i>	As defined within the relevant consent/approval.
<i>Minister</i>	NSW Minister for Planning or delegate.
<i>MW</i>	Megawatt: 1 MW = 1,000 kilowatt (kW)
<i>MWh</i>	Megawatt hour
<i>NEM</i>	National Electricity Market
<i>OC</i>	Occupation Certificate
<i>O & M</i>	Operation and Maintenance
<i>PAR</i>	Post Approval Requirement
<i>PCT</i>	Plant Community Type
<i>Principal Contractor</i>	Consolidated Power Project
<i>Proponent</i>	Edify Energy
<i>PV</i>	PhotoVoltaic
<i>RFS</i>	Rural Fire Services
<i>SDS</i>	Safety Data Sheets
<i>SQE</i>	Safety, Quality and Environment
<i>SSD</i>	<p>State Significant Development, means any of the following:</p> <ul style="list-style-type: none"> • State significant development projects • State significant infrastructure projects (including critical State significant infrastructure projects) • transitional Part 3A projects • Part 4 projects for which the Minister is the consent authority in accordance with the Environmental Planning and Assessment Act 1979.
<i>Tesla</i>	Head Contractor for the BESS – Battery and Transformer Supplier, O & M.
<i>TfNSW</i>	Transport for NSW
<i>WHSEQ System</i>	Work Health Safety Environment and Quality Management System

1 EXECUTIVE SUMMARY

This report presents the findings of an Independent Environmental Audit (IEA) undertaken by Urban Perspectives. The Department of Planning, Industry and Environment (DPIE) appointed Urban Perspectives to assess the environmental performance and compliance status of the Riverina **Battery Energy Storage System (BESS)** located in Darlington Point of Murrumbidgee local government area.

On the 7 December 2018, DPIE approved Darlington Point Solar Farm (DPSF) as State Significant Development (SSD 8392). The BESS project is ancillary to the DPSF and is referred to as Stage 2a of Darlington Point Solar Farm. Edify Energy has completed the construction and commissioning of the Darlington Point Solar Farm as part of a previous stage of the Development which does not form part of Stage 2a of the development.

In October 2022, the DPIE issued a consolidated consent in response to a modification application involving a capacity upgrade of the BESS facility. The capacity upgrade of the BESS remains within the approved 2 ha area within the site. The modified consent (consolidated consent) includes Schedule 4, Condition 7 which requires undertaking an Independent Environmental Audit of the development of the battery storage facility in accordance with the modified consent conditions and *Independent Audit Post Approval Requirements* (DPIE, 2020) guidelines.

1.1 Summary of Findings

Urban Perspectives identified no non-compliances based on observations and findings of the audit. A few minor issues were identified that are categorised as improvement opportunities. It is noted that some consent conditions were not applicable to construction of the BESS.

The Environmental Management Strategy (EMS), which includes the project CEMP, has been generally developed in accordance with the conditions of consent and approvals. There are some opportunities for improvement to ensure continual environmental performance and compliance with the development consent. These are discussed in section 6 – Recommendations and Conclusion (Opportunities for Improvement) of this report.

Total Conditions of Consent	Number of Compliances	Not Triggered	Non-Compliances	Improvement Opportunity
63	38	25	0	3

A total of thirty-eight (38) were identified as relevant to construction of the BESS and twenty-five (25) conditions haven't been triggered. The audit found three (3) improvement opportunities that were identified against **Conditions 15 (Dust) and 21 (water pollution) under Schedule 3 and Condition 8 (access to information) under Schedule 4**. In addition, there is one recommended action for continuing compliance with **conditions 25 (Storage and handling of Dangerous Goods) under Schedule 3**. See section 7.1.2 and 7.1.3 under Appendix A.

2 BACKGROUND

The Darlington Point Solar Farm (DPSF) is a State Significant Development (SSD 8392) project located approximately 10 km south of the township of Darlington Point, NSW along Donald Ross Drive (3.5 km south of the Sturt Highway / Donald Ross Drive intersection, see Figure 2). The Development for DPSF is being undertaken in five (5) distinct stages namely Stage 1, Stage 2a & 2b, Stage 3 and Stage 4.

- Stage 1 - Construction and operation of the solar farm;
- **Stage 2a - Site Preparation for the Battery Energy Storage System (BESS)**
- Stage 2b - BESS battery components and connections to the TransGrid Substation.
- Stage 3 - Operations; and
- Stage 4 - Decommissioning

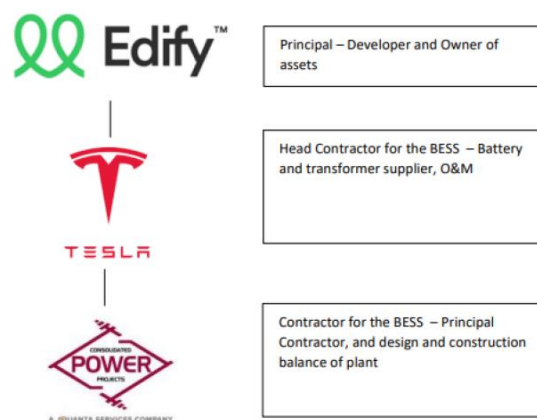


FIGURE 1 PROJECT CONTRACTING STRUCTURE

Stage 1 construction works are complete and the Solar Farm is currently capable of supplying 275MW to the TransGrid substation located adjacent to the site. Construction of Stage 2a has commenced which involve site preparation for the construction of the BESS. The BESS facility is located outside the Solar Farm but is within the greater DPSF site. Construction works previously undertaken for the development of the solar farm formed part of a separate contract package which is not related to the construction of the BESS facility. The primary development activities of the solar farm and the BESS are on separate land parcels and different parties own the assets.

2.1 BESS Technology

The major technological component of the BESS is called megapack, a powerful battery that is fully integrated to provide energy storage and support, helping to stabilize the grid and prevent outages. Each battery module is paired with its own inverter for improved efficiency and increased safety ensuring more power and reliability at a lower cost over its lifetime. Megapack systems are customizable and infinitely scalable, making them suitable for projects of various sizes and locations.

2.2 Development Consent and Modification

On 7 December 2018, DPIE approved SSD 8392 outlining the conditions of consent applicable to the solar farm component, as well as the battery energy storage system identified as an ancillary

infrastructure to the DPSF. Later, Edify Energy lodged a modification application to obtain development consent for the increment of the DP's BESS capacity from 50 MW/ 100 MWh to 200 MW/ 400 MWh and including individual battery power pack cubicles or skid-mounted/containerised power packs, inverters, transformers, switchgear, buried cables and associated equipment to connect to the existing TransGrid Darlington Point Substation. DPIE approved the modification because it was satisfied that *"the modification would improve the ability of the project to store solar energy for dispatch to the grid outside of daylight hours and / or during periods of peak demand, which has the potential to further contribute to increased grid stability and energy security."* On 22 October 2021, DPIE issued a consolidated version of the consent that included all modifications to the original determination instrument.



FIGURE 2 LOCATION OF BESS FACILITY AT DARLINGTON POINT SOLAR FARM, NSW

Construction works for the BESS are located on Lot 1, DP 1249830 and Lot 2, DP1249830, 336 Donald Ross Dr, Darlington Point NSW 2706. The DPSF site and surrounding lands are zoned as RU1 – Primary Production under the Murrumbidgee Local Environmental Plan 2013 (Murrumbidgee LEP).

Darlington Point Solar Farm – Modification 1

Application No	SSD 8392 Mod 1
Description	Increasing Battery Energy Storage Capacity
Applicant	Edify Energy Pty Ltd.
Council Area	Murrumbidgee Council
Determination	Approved
Determination Date	22 October 2021
Consent Authority	Director – Energy Assessments, as delegate of the Minister for Planning and Public Places
Approved Capacity	Delivery capacity of 200 MW, or Storage capacity of 400MWh.

2.2.1 Summary of Consolidated Consent Conditions

Schedule 2 – Administrative Conditions

Schedule 2 consists of **fourteen (14)** conditions of consent relating to the following issues:

- ☐ Obligation to Minimise Harm to the Environment
- ☐ Terms of Consent

- ☐ Staging of the Development
- ☐ Final Layout Plans
- ☐ Upgrading of Solar Panel and Ancillary Infrastructure
- ☐ Work as Executed Plans
- ☐ Notification of Department
- ☐ Structural Adequacy
- ☐ Demolition
- ☐ Protection of Public Infrastructure
- ☐ Operation of Plant and Equipment
- ☐ Batteries

Schedule 3 – Environmental Conditions General

Schedule 3 consists of **thirty (30)** conditions of consent which include various aspects of the following:

- ☐ Transport
 - Over-Dimensional and Heavy Restrictions
 - Designated Over-Dimensional and Heavy Vehicle Access Route
 - Site Access
 - Operating Conditions
 - Unformed Crown Roads
 - Traffic Management Plan
 - Land Management
- ☐ Biodiversity
 - Biodiversity Offsets
 - Biodiversity Management Plan
- ☐ Amenity
 - Construction, Upgrading and Decommissioning Hours
 - Noise
 - Dust
 - Visual
 - Lighting
- ☐ Heritage
 - Protection of Heritage Items
 - Discovery of Human Remains
 - Chance Finds Protocol
- ☐ Soil and Water
 - Water Pollution
 - Operating Conditions
- ☐ Hazard
 - Operating Conditions
 - Fire Safety Study
 - Storage and Handling of Dangerous Goods

- Emergency Plan

- ☐ Waste
- ☐ Accommodation and Employment Strategy
- ☐ Decommissioning and Rehabilitation

Schedule 4 – Environmental Management and Reporting

Schedule 4 consists of **fifteen (15)** conditions of consent which include various aspects related to the following:

- ☐ Environmental Management
 - Environmental Management Strategy
 - Revision of Strategies, Plans and Programs
 - Updating and Staging of Strategies, Plans or Programs
- ☐ Compliance
 - Incident Notification
 - Non-compliance Notification
 - Compliance Reporting
- ☐ Independent Environmental Audit
- ☐ Access to Information

APPENDIX 3: Incident Notification and Reporting Requirements

- Written Incident Notification Requirements: **Four (4)** conditions

3 INTRODUCTION

The BESS of the DPSF is in the Riverina area of western New South Wales, approximately 10km south of Darlington Point and 15km north-east of Coleambally. The site is situated on land adjacent to TransGrid's 330 kV Darlington Point substation at Donald Ross Drive, which supplies power to the National Electricity Market (NEM). The DPSF is located within the Murrumbidgee Council Local Government Area with the southern boundary of the site on the border of the Junee Local Government Area. Road access to the site is via Eurolee Road, which is also located within the Murrumbidgee LGA. The site is situated approximately 1.6 km south of the Murrumbidgee River.

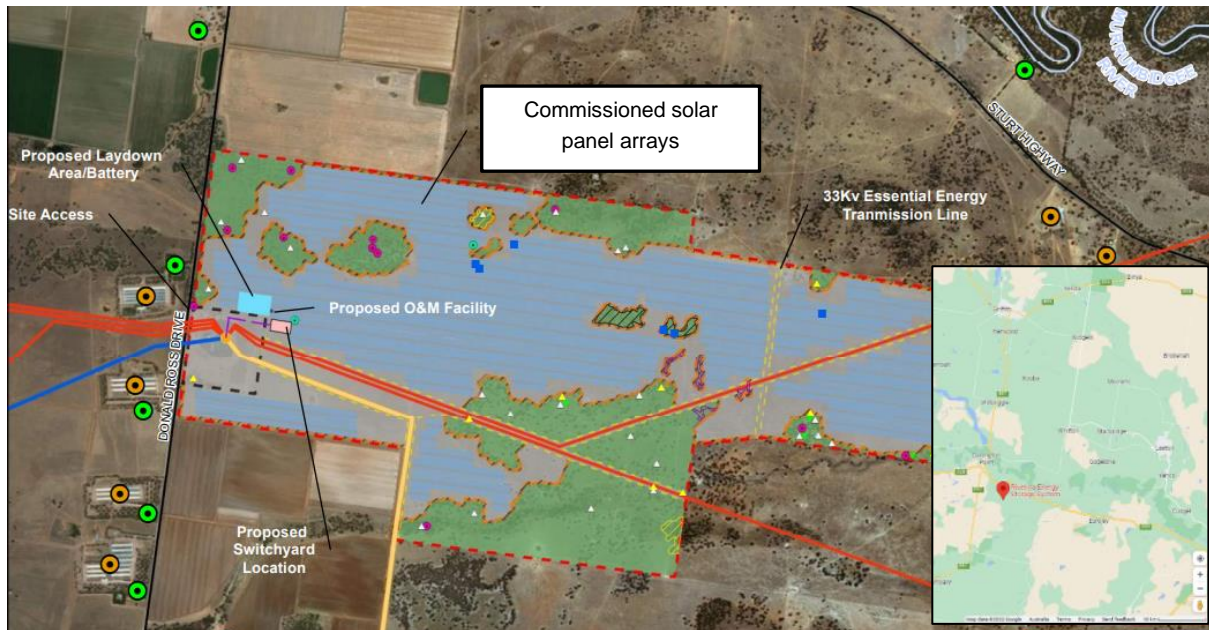


FIGURE 3 SITE LOCATION OF BESS ADJACENT TO DARLINGTON POINT SOLAR FARM

Adjoining the site is a vast area of land comprising approximately 826,850 solar panels that supply up to 275 MW via an upgraded TransGrid substation located adjacent to the DPSF site. There is an existing 132 kV Essential Energy transmission line which runs west of the site and will eventually connect to the BESS.

The scope of works for construction of the BESS include:

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

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



FIGURE 4 SITE FACILITIES

3.1 Audit team

The members of the Audit Team comprised the following:

- *Stuart Wilmot – Lead Auditor*

Stuart Wilmot is a qualified Lead Auditor accredited with the international certifying body JAS-ANZ Exemplar Global (Certificate no. 105563). Stuart also has a Master in Urban and Regional Planning (1997) from the University of Sydney and a Bachelor of Science (1993) from Macquarie University.

- *Wassef Hussain – Assisting Auditor*

Wassef is a qualified Principal Auditor accredited with the international certifying body JAS-ANZ Exemplar Global (Certificate no. 8307256-6126060). Wassef has Bachelor in Environmental Engineering from the University of NSW and Master in Urban Planning from the University of Sydney. He also has certificates in Project Management Practice (Cert IV) and Work Health and Safety (Cert IV).

Apart from the auditors, the following personnel took part in the audit:

- Luke Perabo – Project Manager, CPP
- Rodney Cusbert - Site Manager, CPP
- Liam Chambers – Construction Site Manager, CPP

- Michael Greaves – Site Manager (Substation), CPP
- Hayden Blue – Operator, Abi Civil
- Stanley John Sandler – Operator, Abi Civil

3.2 Audit scope and objectives

The purpose of the Independent Environmental Audit was to obtain an independent and objective assessment of the environmental performance and compliance status of the BESS. The Audit was conducted in accordance with the requirements of the *NSW Government Independent Audit Post Approval Requirements Guidelines* dated May 2020 (Independent Audit Requirements). The structure of the Audit was developed having regard to the requirements of AS/NZS ISO 19011:2014 Guidelines for Auditing Management Systems.

Schedule 4 of the consolidated consent outlines the environmental management and reporting requirements for the development of the battery storage facility. Condition No. 7 provides the following:

Independent Audits of the development of the battery storage facility must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency:

(a) within 3 months of commencing construction.

(b) within 3 months of commencement of operations.

This report is based on objective evidence. The auditor encountered no significant difficulties during the Audit. A copy of the draft report (Version 1.0) was provided to CPP for review on 17 October 2022 for comment. Based on the comments received and additional information or evidence supplied, the audit report was updated to produce a Report that was submitted to Department of Planning and Environment. (Version 2.0).

On the 5 December 2022 Department of Planning and Environment wrote seeking:

- Evidence of consultation undertaken with other agencies other than just Council (refer to section 4.2.3, section 5.7 and Appendix C of this report); and
- Further discussion on whether Environmental Management Plans, Sub-plans and post approval documents are adequate and to include a list of the post approval documents reviewed (refer to section 5.6).

This report (Version 3) includes the updated information that Department of Planning and Environment requested.

3.3 Audit period

Construction of the BESS commenced on 27th June 2022 and audit occurred within 3 months of construction commencing on the 14th September 2022. Therefore, the audit period is from 27th June 2022 to 14th September 2022.

4 AUDIT METHODOLOGY

4.1 Selection and endorsement of audit team

On 11 July 2022, Edify Energy Pty Ltd submitted a request (SSD-8392-PA-5) to the DPIE seeking approval to engage suitably qualified persons to undertake the Independent Environment Audit (IEA) of the BESS Project in accordance with Schedule 4 condition 7(a) of SSD-8392. The Secretary of Department approved the request and agreed to the following audit team from Urban Perspectives:

- Mr. Stuart Wilmot (Lead Auditor); and
- Mr. Wassef Hussain (assisting Auditor)

No other resources were required for this Audit other than the participation of the auditees representing CPP.

4.2 Independent Audit scope development

Developing the scope of the audit required review of the consolidated consent conditions issued to Edify Energy in October 2021. The IE Auditors provided an audit plan to CPP and requested copies of relevant documents applicable to Stage 2a of the project.

Key aspects of the Audit included:

- Collection of relevant background documentation including plans, programs and strategies
- Consultation with relevant local authority concerned with the ongoing development
- An opening meeting
- Site inspections
- Interview with relevant project personnel
- Collection of evidence and evaluation of project/management documentation
- A close out meeting
- Preliminary Feedback
- Compilation of the audit report for final release

4.2.1 Document Review

During the planning phase of the audit, the IE Auditors drafted a checklist and sent it to CPP project management team. In response, CPP shared several documents including plans, registers, permits and records with the IE Auditor electronically prior to and during the audit.

The documents listed below were reviewed prior to and during the audit to allow the auditors to gain an understanding of the site and the overall program and activities undertaken for Stage 2a development:

TABLE 1 LIST OF DOCUMENTS REVIEWED DURING THE AUDIT

Document Name	Approver	Date
Accommodation and Employment Strategy, Riverina Battery Energy Storage System (BESS) Stage, Rev 1.3, CPP	DPIE	7 Jul 2022
Chance Finds Protocol, Darlington Point Solar Farm, Signal Energy	DPIE	21 Mar 2019
Community Consultation and Engagement Plan, Riverina Energy Storage System & Darlington Point Energy Storage System, Rev 1, CPP	DPIE	Dec 2021

Document Name	Approver	Date
Construction Environmental Management Plan, Riverina Battery Energy Storage System (BESS) Stage, Rev 1.3, CPP	DPIE	7 Jul 2022
Erosion and Sediment Control Plan, CPP	DPIE	28 Mar 2022
Traffic Management Plan, Riverina Battery Energy Storage System (BESS) Stage, Rev 1.5, CPP	DPIE	7 Jul 2022
Notification of construction of Solar Farm Battery, Darlington Point Solar – (SSD – 8392)	DPIE	21 Jun 2022
Tesla Notification Letter to DPIE, Commencement of Construction Stage 2a (SSD 8392)	DPIE	14 Jun 2022
Approval Letter, Darlington Point Solar Farm - Revised Staging Request (SSD-8392) –7 June 2022	DPIE	7 Jun 2022
Request letter for Approval, State Significant Development 8392 – Request Letter for approval to proceed to commence construction prior to approval of all plans/strategies for BESS stage of Development	DPIE	6 Jun 2022
Request letter to DPIE, State Significant Development 8392 – Request Letter for approval to proceed to commence construction prior to approval of all plans/strategies for BESS stage of Development	DPIE	2 Jun 2022
Construction Certificate SSD/CC 8392-4 Control Room for Battery Energy Storage yard <ul style="list-style-type: none"> - Consent - Fire Safety Schedule - Structural Calculations and Details for Control Building - Notice of Commencement 	Murrumbidgee Council	26 Jul 2022
Construction Certificate SSD/CC 8392-5 Auxiliary Services Building, Switchgear Building, and Spill oil tank <ul style="list-style-type: none"> - Consent - Fire Safety Schedule - Stamped Plans Riverina BESS 132 kV Substation Auxiliary Services Building, TransGrid - Notice of Commencement 	Murrumbidgee Council	12 Aug 2022
Weed Survey – Letter Report, Riverina BESS, Darlington Point, NSW, CPP	CPP	Jun 2022
Dilapidation Survey, Donald Ross Drive prepared by LG Civil Pty Ltd. on behalf of CPP	NA	9 Jun 2022

Supporting Documents Viewed

In addition, the following documents were viewed on site during the audit:

- Permit Register for the Riverina Battery Energy Storage System (BESS)
- Material Classification, including Geotech reports and VENM classification
- Geotech advice and classification and supporting documentation.
- Names of local contractors and suppliers – Riverina BESS
- Sound Monitoring Register
- Transmittal Record – distribution of CEMP and relevant sub-plans to Subcontractor.
- Vehicle Movements Tracking Record
- Waste Register
- CPP Cleanfill dockets – 14.7.22 to 19.7.22
- Weekly Site Inspection Checklist
- Work Health and Safety Management Plan – Rev.4

4.2.2 Council Consultation

During the planning phase of the audit, Urban Perspectives sent a formal letter to the General Manager of Murrumbidgee Council (dated 06 September 2022) to establish whether the local community had expressed concerns or made complaints during construction of the BESS. Council has not provided a response.

4.2.3 Evidence of consultation undertaken with other agencies

The IE auditors received comments from DPIE on 5 Dec 2022 following submission of this Independent Audit Report - Rev 2. Beside consultation with the local council, it is a requirement to correspond with other relevant departments and agencies surrounding the independent audit. In response, the IE Auditors sent formal letters to relevant key stakeholders on 15 December 2022 via email seeking input and feedback regarding construction of BESS during Stage 2a of DPSF development. Appendix C of this report includes evidence of individual letters sent to the following key stakeholders:

- Griffith Aboriginal Land Council
- Division of Resources and Geoscience, DPIE
- NSW Environment Protection Authority (EPA)
- Heritage Division, NSW Office of Environment and Heritage (NSW Heritage)
- NSW Department of Industry, Lands and Water Division (DPE – Water)
- Office of Environment and Heritage
- Fire and Rescue NSW
- NSW Rural Fire Services (RFS)
- TransGrid

Responses were received from DPE Water, NSW Heritage, EPA and Office of Environment and Heritage. A summary of their response is provided in Section 5.7 of this report.

4.3 Site inspections

Stuart Wilmot (Lead Auditor), accompanied by Wassef Hussain (Assisting Auditor), undertook site inspection on 14 September 2022. The purpose of the site inspection was to discuss the compliance status of the Project with relevant site personnel, view environmental management records, view the status of on-site environmental controls and observe general environmental performance and Development Consent (and associated management plans and strategies) compliance for the Project.

4.4 Site personnel interviews

During the site inspection access was requested to all development areas and environmental aspects that formed part of the Project.

During the audit, the following people were interviewed:

- Project Manager / Site Manager – Luke Perabo
- HSEQ Manager – Jarrod Erbs
- Site Manager – Rodney Cusbert
- Site Construction Manager – Liam Chambers
- Hayden Blue – Operator, Abi Civil
- Stanley John Sandler – Operator, Abi Civil

4.5 Opening Meeting

An opening meeting was held at the CPP's project site office on Wednesday 14 September 2022 attended by Stuart Wilmot of Urban Perspectives (Lead Auditor) and Wassef Hussain of Urban Perspectives (Assisting Auditor). The following project personnel were present during the kick-off meeting:

- Luke Perabo – Project Manager, CPP
- Rodney Cusbert – Site Manager, CPP
- Liam Chambers – Construction Site Manager, CPP

The IE Auditors provided an explanation of the independent audit process in the meeting following completion of site induction delivered by the project team. It was also specified that the audit report would be based on objective evidence for which auditors would need to conduct site inspection jointly with key personnel of the BESS project.

4.6 Closing Meeting

The closing meeting was conducted on 14 September 2022, prior to departing the Site, and included a discussion on the preliminary audit findings. Stuart Wilmot of Urban Perspectives briefly discussed with Rodney Cusbert, CPP Site Manager and presented a summary of key findings and observations along with a few recommendations in relation to day-to-day site management. A summary of the main findings was provided in the meeting and a general view that overall, the project appeared to be well managed and employing good practices with respect to the Conditions of Consent.

4.7 Report Preparation

Based on the comments received and additional information or evidence supplied, the audit report was updated to produce this Final Report (Version 2.0).

4.8 Compliance Status Descriptors

Reporting of compliance is based on the compliance status descriptors as defined in the Independent Audit Requirements as shown in **Table 2**.

TABLE 2: COMPLIANCE STATUS DESCRIPTORS

Status	Description
(C) Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
(NC) Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
(NT) Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

5 AUDIT FINDINGS

5.1 Approval and Document List

The CEMP approved by DPIE for Stage 2a forms the Environmental Management Strategy EMS for the project. The EMS provides a strategic framework for all environmental management plans as required by the Development Consent (SSD 8392). The following documents support the CEMP:

Staging Request 2a

- State Significant Development 8392 – Request Letter for approval to proceed to commence construction prior to approval of all plans/strategies for BESS stage of Development, 2 June 2022
- State Significant Development 8392 – Request Letter for approval to proceed to commence construction prior to approval of all plans/strategies for BESS stage of Development, 6 June 2022
- Approval of Staging Request - Darlington Point Solar Farm - Revised Staging Request (SSD-8392), 7 June 2022

Modification Report & Assessment

- SSD 8392 Modification Report (Application) – Battery Energy Storage System, Edify Energy, June 2021
- Darlington Point Solar Modification 1, *Increasing BESS Capacity State Significant Development Modification Assessment (SSD 8392 MOD 1)*, October 2021
- Modification of Development Consent, Instrument of Modification, *Increasing the battery energy storage system capacity*, 22 October 2021

Environmental Management Strategy / Construction Environmental Management Plan (CEMP) Stage 2a

- Approval, Construction Environmental Management Plan - Darlington Point Solar Farm project – BESS Stage 2a, 17 June 2022
- Construction Environmental Management Plan (CEMP) BESS 2a, Rev 1.3; 7 July 2022- includes Chance Finds Protocol, Darlington Point Solar Farm, Signal Energy, Mar 2019

Accommodation and Employment Strategy

- Approval, Accommodation and Employment Strategy for Darlington Point Solar Farm project, 7 June 2022
- Accommodation and Employment Strategy, 7 June 2022

Biodiversity Management Plan

- Approval, Biodiversity Management Plan for Darlington Point Solar Farm - Stage 2a (SSD-8392), 15 June 2022
- Biodiversity Management Plan, Darlington Point SF Construction, Final V8, 4 June 2019

Traffic Management Plan

- Approval, Traffic Management Plan for Darlington Point Solar Farm – BESS Stage 2 (SSD-8392), 4 July 2022
- Traffic Management Plan, BESS Stage 2a - Rev 1.5; 7 July 2022

5.2 Compliance Performance

TABLE 3 COMPLIANCE PERFORMANCE MATRIX

STATUS	Schedule 2	Schedule 3	Schedule 4	Appendix 3	TOTAL NUMBER
Compliant	9	20	9	-	38
Non-Compliant	0	0	0	-	0
Not Triggered	5	10	6	4	25
TOTAL	14	30	15	4	63

5.3 Summary of Agency Notices, Orders, Penalty Notices and Prosecutions

There are no known Agency Notices, Orders, Penalty Notices or Prosecutions.

5.4 Non-Compliances

The audit has not identified any non-compliance with the conditions of consent that apply to the Stage 2a development.

5.5 Previous audit recommendations

There are no previous audits of the BESS Facility (Stage 2a). Edify submitted a Pre-operation Compliance Report for solar farm dated 31st March 2022 (Darlington Point Solar Farm | Planning Portal - Department of Planning and Environment (nsw.gov.au)).

5.6 EMP, Sub-plans and compliance documents

DPIE approved a suite of post approval documents applicable to BESS project stage 2a (Site preparation for BESS) of the DPSF (SSD 8392). Conditions in the Modification 1 (dated 22 Oct 2021) consent stipulate that specific post approval documents be prepared and submitted to DPIE prior to the commencement of construction. The overarching plan amongst the suite of post approval documents is the Environmental Management Strategy (EMS) which is also identified as Construction Environmental Management Plan (CEMP).

As part of this audit, the following post approval documents relating to Stage 2a of the SSD have been assessed to determine if they have been developed and implemented in accordance with the conditions of consent and their content is adequate. The key management documents include:

- Construction Environmental Management Plan or Environmental Management Strategy (Condition 6 of Schedule 2)
- Accommodation and Employment Strategy (Condition 28 of Schedule 3)
- Biodiversity Management Plan (Condition 12 of Schedule 3)
- Traffic Management Plan (Condition 7 of Schedule 3)
- Chance Finds Protocol (Condition 20 of Schedule 3)
- Final Layout Plans (Condition 6 of Schedule 2)

Further to the above, CPP was preparing lodgement of the Emergency Plan (Condition 26 of Schedule 3) and Fire Safety Study (Condition 24 of Schedule 3) to DPIE for approval to commence Stage 2b

works. Management Plans relevant to the development of solar farm had been approved separately for Stage 1 of DPSF development. The solar farm is now operational.

5.6.1 Construction Environmental Management Plan (CEMP) or Environmental Management Strategy (EMS)

The CEMP / EMS was prepared by Consolidated Power Projects (CPP) and the most recent version viewed as part of this audit was “Rev 1.3” dated 7 Jul 2022. On 15 June 2022, DPIE issued approval letter to Tesla Motors in favour of the management plan identified as “Rev 1.2” dated 15 June 2022. Amendment from Rev 1.2 to Rev 1.3 includes an update to the Construction Activity Zone Map contained within the document. The auditor considers the EMS has been generally developed in accordance with the conditions of consent (Condition 1 of Schedule 4) and approvals and that the content is generally adequate. However, there appears to be some opportunities for improvement to ensure continual environmental management performance and compliance with the Development consent which are discussed within Section 6 (Opportunities for Improvement) of this report.

5.6.2 Accommodation and Employment Strategy (AES)

The Accommodation and Employment Strategy (AES) was prepared by CPP and the most recent revision viewed as part of this audit was “Rev 1.3” dated 7 Jul 2022. On 7 June 2022, DPIE issued approval letter under Condition 28 of Schedule 3 to Tesla Motors in favour of the management plan identified as “Rev 1.2” dated 7 June 2022. The auditor considers the AES has been developed in accordance with the conditions of consent (Condition 28 of Schedule 3) and approvals and that the content is adequate. Amendment from Rev 1.2 to Rev 1.3 includes an update to the Construction Activity Zone Map.

5.6.3 Biodiversity Management Plan (BMP)

A Biodiversity Management Plan (BMP) Revision “Final V8.0” dated 04 June 2019 was prepared by NGH Environmental under Condition 12 of Schedule 3 which DPIE later approved for Stage 2a – BESS works. This BMP had been developed in consultation with NSW Office of Environment and Heritage (OEH) in relation to works for the Solar Farm construction and operation.

On 15 June 2022, DPIE issued a letter to Tesla Motors responding to Edify’s request of utilizing the existing BMP for activities associated with ‘Stage 2a – Site Preparation for the BESS. Subsequently, the Biodiversity Management Plan was reapproved by DPIE prior to commencement of construction for Stage 2a works. The auditor considers the BMP has been developed in accordance with the conditions of consent and approvals and that the content is adequate and being implemented on site.

The Department of Planning and Environment has recently approved a standalone Biodiversity Management Plan for Stage 2b of DPSF development, which is not the subject of this audit.

5.6.4 Traffic Management Plan (TMP)

The Traffic Management Plan (TMP) for Darlington Point Solar Farm – BESS Stage 2a (SSD-8392) was prepared by CPP and the most recent version viewed as part of this audit was “Ver 1.5” dated 07 July 2022. This TMP is an outcome of amendment to the previous version identified as Rev 1.4 dated 02 Jul 2022, which DPIE had approved on 04 Jul 2022 under Condition 7 of Schedule 3 of the consent. The amendment covered the aspect of approval by DPIE in relation to an increase in the number of Over-Size, Over Mass (OSOM) movements from 15 to 25. Regardless of the above, the project must still comply with the limit of 80 heavy vehicle (including OSOM) movements a day.

The auditor considers the TMP has been developed in accordance with the conditions of consent and approvals and that the content is adequate and being implemented on site. Furthermore, the TMP was developed in consultation with Transport for NSW (TfNSW) and Murrumbidgee Council, and to the satisfaction of the Secretary.

Amendments from Rev 1.4 to Rev 1.5 includes (i) an Updated construction activity zone map and (ii) updated designated parking areas.

5.6.5 Chance Finds Protocol

The Chance Finds Protocol that DPIE had previously approved for Stage 1 – solar farm construction and operation was incorporated to the current CEMP / EMS. The Chance Finds Protocol, prepared by Signal energy was approved by DPIE under Condition 20 of Schedule 3 of the consent and subsequently adopted for Stage 2a works. Previously, Principal Contractor Signal Energy undertook construction works for the solar farm component. At present, CPP is responsible for Stage 2a works which involve site preparation for BESS project.

5.6.6 Final Layout Plans

The final layout plans observed during the audit were filed in separate folders. No major amendments noted during the audit phase.

5.7 Consultation outcomes

The IE Auditors contacted the local Council via email regarding the environmental audit. No response received from Murrumbidgee Council.

The IE Auditors also emailed the following departments, agencies and regulatory authorities seeking comments on BESS Stage 2a of the DPSF development:

- NSW Land and Aboriginal Council – Griffith
- Division of Resources and Geoscience, DPIE
- NSW Environment Protection Authority
- Heritage Council of NSW
- Department of Industry, Lands and Water Division, DPIE
- Office of Environment and Heritage (OEH)
- Fire & Rescue NSW
- Rural Fire Services NSW
- Roads and Maritime Services (RMS), Transport for NSW (TfNSW)
- Transgrid

Appendix C includes copies of correspondence to Council, Government departments, agencies and regulatory authority.

Responses were received from the following departments and agencies:

5.7.1 DPE (Water)

The Department of Planning and Environment – Water (DPE - Water) provided a response on 19 December 2022. The following table summarises comments received from DPE (Water) and the audit findings.

Comments from DPE (Water)	Auditor's Findings
<p>The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation.</p> <ul style="list-style-type: none"> <i>Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan</i> <i>Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.</i> 	<p>Post approval documents relating to Stage 2a – preparation for BESS of DPSF development (SSD-8392) include the Construction Environmental Management Plan (CEMP) / Environmental Management Strategy prepared in accordance with Condition 1 of Schedule 4</p> <p>The aspect of water management for stage 2a works primarily involves implementation of Surface Water Management and Erosion and Sediment Control Plan. There is a site-specific Erosion and Sediment Control Plan developed and approved by DPIE which rests with the CEMP.</p> <p>The Battery Pack Pads are constructed about 100mm above ground to be above the 1 in 100 flood event. Given the site is raised there is a low risk of encountering groundwater during construction.</p>
<p>The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.</p>	<p>The Soil and Erosion Plan includes construction of an evaporation pond. No discharge of water from the pond is anticipated. Condition 21 requires that the Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p> <p>To ensure compliance it is recommended CPP prepare a trigger response plan in case the evaporation pond overflows due to excessive rain. The plan would include procedures for the monitoring of water levels within the pond, trigger levels for controlled discharge of water onsite from the evaporation pond and testing and treatment of water before its discharge.</p>
<p>Water supply availability is clearly defined for the project. Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.</p> <ul style="list-style-type: none"> Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from. Annual reporting clearly documents; i) water take, use and water source impacts, ii) compares results with previous year's, and iii) identifies exceedances and how these are managed/mitigated. 	<p>DPIE approved Darlington Point Solar Farm (DPSF) as State Significant Development (SSD 8392). Section 4.41(g) of the EP&A Act exempts State Significant Development from a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.</p> <p>The EIS states:</p> <p><i>there is no intent for any volumetric water licencing requirement with no water entitlement being required to be purchased. Construction water use will be minimal and would be mainly used for dust suppression on unsealed roads. Actual water use would depend on weather and ground conditions and is difficult to estimate accurately. Potential sources would be existing onsite dams and truck delivery sourced from local water sources where</i></p>

Comments from DPE (Water)	Auditor's Findings
	<p><i>available. (pp 209 Darlington Point Solar Farm Environmental Impact Statement 2018)</i></p> <p>Water from the evaporation pond is reused for general construction / dust suppression and moisture conditioning of material as described in the EIS and in accordance with the development approval.</p>

5.7.2 Biodiversity and Conservation Division – South West, DPIE

The Biodiversity and Conservation Division of DPE sought information involving audit scope from the IE Auditors. In response, the IE Auditors provided the scope of the audit and the consent conditions relevant to Biodiversity Management. No further comments were received from the Biodiversity and Conservation Division – South west.

5.7.3 NSW Environment Protection Authority

The EPA responded on 22 December 2022 and confirmed that the EPA has no comments in relation to the Independent Audit and no further follow up consultation was required.

5.7.4 Heritage NSW – Office of Environment and Heritage, DPE

The Heritage assessment team responded on 22 January 2023 and advised it has no community concerns, complaints or issues regarding heritage aspect associated with the BESS Project Stage 2a of DPSF-8392.

5.8 Complaints

CPP maintains a community complaint register. No complaints were received in relation to the ongoing construction works for Stage 2a of DPSF development.

5.9 Incidents

An incident is defined in the consent conditions as “*a set of circumstances that causes or threatens to cause material harm to the environment*”. No reportable incidents recorded.

5.10 Actual versus predicted environmental impacts

During the development of the Environmental Impact Statement (EIS), impacts were predicted, and risk assessed. An assessment of the comparison of the actual against the expected impacts is included below in Table 4. Only aspects and impacts found to be relevant to Stage 2a works are considered hereunder.

TABLE 4 ACTUAL VERSUS PREDICTED ENVIRONMENTAL IMPACTS

Predicted Potential Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
Accommodation and Employment		
An increase in workers to the Darlington Point area providing economic stimulus into the local Economy.	Sub-contractors and Suppliers nominated by CPP are mostly located in towns and areas within Murrumbidgee and Griffith local government areas. Local suppliers and trades engaged by Subcontractor operate respective businesses within Riverina region that covers Darlington Point area.	Accommodation and Employment Strategy in place ensure that appropriate accommodation options are made available for the project workforce within the local area throughout the duration of the project.
Lack of facilitation for the accommodation of the workforce associated with the development.	Workers employed under various sub-contractors live and travel locally to attend duties.	
Biodiversity		
Direct impacts predicted for the project included the removal (and habitat loss) of up to 58ha of grassland, 8.3ha of woodland, and 1.92ha of aquatic habitat (being six farm dams), as well as the removal of up to six isolated hollow-bearing trees.	No tree removal was undertaken prior to commencing construction of the BESS facility located adjacent to the Solar Farm.	Construction footprint of the BESS is outside the scope and limits of the solar farm site.
Removal of habitat features, e.g. hollow-bearing trees.	Vegetation fencing and exclusion zones in place. Boundary fencing in place.	No tree removal has occurred for undertaking construction works during Stage 2a
Cultural Heritage		
Damage or disturbance to relics and artefacts identified as Aboriginal heritage items.	No unexpected finds encountered so far during construction of the BESS facility.	Chance Finds Protocol in place for managing unexpected finds encountered during construction phase.
Noise Impact		
Construction Noise	No significant and/or unpredicted noise impacts were noted at the Project site during the Auditor's site visit of 14 September 2022.	Periodic maintenance of plant and equipment was confirmed to have been conducted to ensure optimal operating performance. Reduced speed limits were observed to be in place to assist in limiting noise from moving plant/equipment.
Visual		
Construction night lighting providing nuisance to neighbours or hazardous to drivers.	No permanent lighting in place at time of the audit.	Night time construction work does not occur in Stage 2a.
Loss of natural ground cover as a result of construction thus exposing bare soil.	Disturbance to natural ground cover limited to areas occupied for establishment of construction footprint approved by DPIE.	Topsoil is retained on site during excavation and is intended to be reused for landscaping works.

Predicted Potential Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
Soils and Water		
Development causing water pollution as a result of construction works undertaken.	No offsite impact detected during site inspection apart caused by overland flow of muddy water.	Evaporation pond constructed to store stormwater runoff and designed to catch first flush pollutants.
Potential for soils to have been affected by fuel/chemical spills.	No evidence of oil spills observed on the BESS site during the audit inspection.	Spill containment measures in place. Spill kits are located within close reach of various work groups undertaking excavation, formworks, welding, etc.
Traffic and Access		
Dust generation on site due temporal increase in traffic impacting on surrounding properties	CPP maintains record on how many heavy vehicles including over-dimensional vehicles are entering and leaving site per day.	Number of construction vehicles accessing work site monitored in accordance with the Traffic Management Plan.
Waste		
Potential for general litter and rubbish across the site if inadequate waste management is undertaken.	Source separation of wastes implemented on site (refer to Appendix F, Photo 3).	Clean fill wastes transported to Tharbogang landfill owned by Griffith City Council. EPL No. 5875 Liquid Waste is collected and transported to Yenda Sewage Treatment Plant for disposal by PK Plumbing, part of Pumpout Septic Service, Riverina NSW.
Hazardous Materials and Development		
Fire risks associated with the development, especially in regard to storage of hazardous materials such as fuel (petrol), toxic substances such as pesticides (herbicides) or miscellaneous dangerous substances and articles, for instance, Li-ion batteries certified to UN34.80	No fire incident has occurred on site.	The DPSF site, including the footprint of the BESS is identified as not being within bushfire prone land. Li-ion batteries or Megapacks have not arrived on site and do not form part of Stage 2a works. A 7,000 litre water supply tank is available at the BESS site.

5.11 Site inspection

The Auditors conducted joint inspection with CPP project team to obtain appropriate evidence regarding the compliance status and environmental performance of the Project. It is noted that all areas of the site were accessible to the Auditors at the time of the site visit.

The BESS facility contains delineation fencing and maintains dedicated access to the site. During the site inspection, the auditors observed a wide range of construction activities occurring at the BESS construction site such as earthworks, formwork, concrete pouring and ground stabilization. The ground condition was relatively dry apart from a few puddles of water observed within site compound near the car park area. According to the meteorological data available for Darlington Point station, the maximum rainfall was recorded on Friday, 9 September which was 22.6 mm. Since Sunday, 11 September, the site experienced intermittent rain of less than 1mm daily. Hence, the site had not experienced much

rainfall over the week leading up to the inspection and the weather was clear and sunny, with temperature ranging between 16-18°C.

During the site inspection, the auditors observed work practices and the effectiveness of relevant environmental control and mitigation measures associated with the implementation of the environmental management plan. Evidence for the audit collected during the site inspections is presented within the column titled “Evidence Collected” in the Independent Audit Table ([Appendix A](#)). In addition, site inspection photographs are presented within [Appendix F](#).

5.12 Site interviews

Apart from interviews held with the key project personnel, the Auditors also spent some time speaking to plant operators in relation to maintenance of mobile plant & equipment. Furthermore, one of the key personnel responsible for the storage and handling of chemicals substances also took part in the interview while the site inspection was ongoing.

5.13 Previous annual review or compliance report recommendations

Not triggered.

5.14 Key Strengths

The auditors observed that the project team were generally committed to carrying out their responsibilities in an environmentally responsible manner. The sub-contractors, contracted to the project are provided not only with the project management plan, but also with plans and procedures associated with environment, quality and safety, with a focus on environmental obligations. Key environmental topics delivered in the induction are geared towards meeting compliance with the modification consent conditions of the DPSF development.

Record keeping, including filing of various documents and maintenance of registers has gradually transitioned from conventional paper based to electronic cloud storage system. Through CPP's HSE App, project personnel can undertake operational tasks, record their findings and exchange files and documents instantly, thereby reducing the potential for the amount of paper waste generated.

General housekeeping across the Project site was of a high standard. Source separated skip bins were kept on site having appropriate labels. Site compound was generally tidy other than mud tracking near site entry gate because of ground conditions being wet following earlier rainfall.

The construction team maintains sufficient resources for responding to spill events. There were spill kits strategically placed around the work activity areas within the site, so in case of a spill event, site personnel can readily deploy spill containment measures.

CPP maintains a tracking system by recording the number of heavy vehicle movements in and out of BESS site. It appears that the tracking system has been implemented appropriately, demonstrating transparency, and helping in detecting the number of heavy vehicle movements occurring daily during construction of the BESS. It is also evident that records are maintained of heavy vehicle movement associated with BESS project.

6 RECOMMENDATIONS AND CONCLUSION

The IE Auditor made observations during site audit and gathered necessary findings during inspection as well as through discussion and interviews with CPP project personnel. All areas of the site that were visited during the site inspection were observed to be well managed with site personnel demonstrating a good understanding of management actions and responsibilities to minimise impacts from construction activities. A review of management plans found that all required plans were in place and being implemented well. Also, it is considered that the mitigation measures outlined in the DPIE-approved Environmental Management Strategy, as well as other strategies, plans and programs required within the Development Consent were adequate and effective in minimising impacts associated with construction of the Project.

The audit has triggered some recommendations and improvement opportunities arising from the site inspection and document review. The opportunities for improvement are primarily concerned with the maintenance of environmental controls and implementation of mitigation measures for sediment control, dust management and public access to information on Edify's website. Below are a few improvement opportunities the IE Auditor has raised for the audit:

TABLE 5 OPPORTUNITIES FOR IMPROVEMENT IDENTIFIED IN CONSTRUCTION AUDIT

Ref No.	Condition of SSD 8392 Mod 1	Type	Opportunity for Improvement Identified	CPP Response	Auditor's Comment
1.	<u>Schedule 3, Condition 15</u> Dust	Improvement opportunity	Condition 15 requires that the Applicant minimise the dust generated by the development. Recommend use of mechanical street sweeper as mud tracking becomes more frequent.	<p><i>CPP has utilised a sweeper attachment on a skid steer on multiple occasions to remove any soil / mud from the sealed section of our site entry as required to ensure no excess mud is deposited on Donald Ross drive. This will be completed ongoing on a needs basis.</i></p> <p><i>Recently, dust has not been an issue due to the constant wet weather.</i></p> <p><i>A rumble grid is installed which all vehicles must exit over when leaving site to assist in removing any mud from wheels.</i></p>	Noted. Continue monitoring for mud tracking offsite and deploy suitable resources to avoid or minimise potential for sediment runoff.
2.	<u>Schedule 3, Condition 21</u> Soil and Water> Water Pollution	Improvement opportunity	Condition 21 requires that the Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act. To ensure compliance it is recommended CPP develop procedures for the monitoring, testing, treatment and controlled discharge of water from the evaporation pond onsite. It is also recommended the washout pit be designed to ensure spillage does not overflow and can be easily maintained.	<p><i>CPP will develop procedures for the monitoring, testing, treatment and controlled discharge of water from the evaporation pond on site. This will be included in a revision of the CEMP.</i></p> <p><i>The Bess has a dedicated concrete wash out pit. The bay has been constructed with high bund walls and secured black plastic. The pit is cleaned out before it reaches its capacity and re-lined with black plastic. The pit has been designed to accommodate a reversing Agi truck or boom pump.</i></p>	Noted
3.	<u>Schedule 3, Condition 25</u> Storage and Handling of Dangerous Materials	Recommended Action	Condition 25 requires the Applicant to store and handle all chemicals, fuels and oils used on-site in accordance with the requirements of all relevant	<i>CPP has 558 hazardous chemicals listed in a company master register that is available on site electronically. Each individual hazardous chemical has an accessible accompanied SDS.</i>	Noted.

Ref No.	Condition of SSD 8392 Mod 1	Type	Opportunity for Improvement Identified	CPP Response	Auditor's Comment
			<p>Australian Standards and the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. The EPA Handbook requires that SDS for all chemicals are up-to-date and accessible at any time. It is recommended that the Site SDS register be maintained and kept up to date.</p>	<p><i>The BESS project has identified 51 hazardous chemicals that are on site or are frequently used. Each hazardous chemical has an SDS that is readily assessable electronically and in the field in a hard copy folder. The folder is located within the project Haz chemical container. Any new chemicals identified during audits or inspections, are printed, and saved from the master register and into the site registers and folder.</i></p> <p><i>A complete review of the site register SDS register has been completed and currency of SDS's has been confirmed.</i></p> <p><i>A review of all substances on site has also been completed to ensure SDS's are available.</i></p>	
4.	<p><u>Schedule 4, Condition 8</u></p> <p>Access to Information</p>	Improvement Opportunity	<p>Condition 8 requires that information relating to the construction and development for DPSF be publicly available on Applicant's website. The following plans approved by DPIE have been sighted during the audit period:</p> <ul style="list-style-type: none"> • BESS Construction Environmental Management Plan (CEMP) for BESS Stage, Rev 1.3 dated 7/7/2022 • BESS Accommodation and Employment Strategy (AES) for BESS Stage, Rev 1.3 dated 7/7/2022 • Solar Farm - Biodiversity Management Plan, Ver 8.0 dated 4/6/2019 	<p><i>Either the documents that are currently on the project website have been updated since the auditor conducted the audit, or the finding is incorrect. The dot-pointed items are on the page (https://edifyenergy.com/project/riverina-darlington-point/) under the 'Related Documents' tab.</i></p> <p><i>In any case, the website is currently compliant with the Condition. However, it will be updated in the coming days once we are notified that Stage 2b(i) has commenced.</i></p>	<p>Noted. It appears that the proponent has recently uploaded relevant documents including management plans on their company website. The proponent, being Edify Energy had completed stage 1 works for the development of solar farm through engaging Signal Energy. The proponent needs to ensure that not only the approved plans are uploaded, but also the approval letters issued by DPIE for Stage 2a works remain publicly available on the project website at the earliest convenience.</p>

Ref No.	Condition of SSD 8392 Mod 1	Type	Opportunity for Improvement Identified	CPP Response	Auditor's Comment
			<ul style="list-style-type: none"> • BESS - Traffic Management Plan for BESS Stage, Rev 1.5 dated 07/07/2022 • BESS Emergency Management Plan, Rev 0, dated 13 Feb 2022. • Final Layout Plans relevant to BESS <p>It is noted that management plans including community engagement plan relating to Stage 1 works are available on Edify's website. However, the <i>Biodiversity Management Plan</i> currently available on Edify's project website is not the identical version that DPIE had approved earlier as noted in the approval letter dated 15 Jun 2022. The officially approved plan is Ver 8.0, dated 4 Jun 2019, which is called <i>Biodiversity Management Plan for Darlington Point Solar Farm - Stage 2a</i>. It is stated in the approval letter that the approved plan is to be placed on the project website at the earliest convenience.</p> <p>Recommendation is to upload the correct approved plans, especially the Biodiversity Management Plan along with the approval letter. Likewise, the Emergency Management Plan, along with DPIE's approval letter would also need to be uploaded on Edify's website for stage 2b works.</p>		

Ref No.	Condition of SSD 8392 Mod 1	Type	Opportunity for Improvement Identified	CPP Response	Auditor's Comment
			The Final Layout Plans are available on Edify's website, but not on DPIE's major project portal. Recommendation would be to correspond with DPIE to have the Final Layout Plans uploaded.		

See Response to Audit Findings in Appendix H

7 APPENDICES

APPENDIX A
Independent Audit Table

7.1 Appendix A- Independent audit table

7.1.1 Schedule 2 – Administrative Conditions (Modification 1, 22 October 2021)

SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
CoA	Compliance Requirement	Evidence Sighted	Audit Findings and Recommendations	Compliance Status
1.	Obligation to minimise harm to the environment In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	Site inspection 14 September 2022	Based on observations during the audit, CPP has the necessary resources including plans and procedures at project and organizational levels to carry out obligatory tasks to minimise environmental harm. Evidence was collected in relation to Stage 2a works that apply to development for the BESS. Operation, upgrading or decommissioning phases have not yet occurred.	Compliant
2.	Terms of Consent The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent.	Site inspection 14 September 2022 Interview with employees on 14 September 2022 Review of plans, records and relevant documents. <i>(Our reference: Evidence S2-C2)</i>	The development is being carried out generally in accordance with the EIS and the conditions of this Development Consent. No significant adverse impacts associated with construction were identified during the audit. Refer to section 5.11 of this report for compliance with the EIS.	Compliant
3.	Terms of Consent If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	Review of plans, records and relevant documents. <i>(Our reference: Evidence S2-C2)</i>	The CEMP for Stage 2a addresses conditions outlined in the Consolidated Consent issued on 22 October 2022. There have been no reported inconsistencies between the plans and documentation referred to in this condition.	Compliant

SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
CoA	Compliance Requirement	Evidence Sighted	Audit Findings and Recommendations	Compliance Status
4.	Terms of Consent The Applicant must comply with any requirement/s of the 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	Site inspection 14 September 2022 <i>(Our reference: Evidence S2-C4)</i>	CCP is corresponding with Tesla and Edify Energy regarding submission of <i>Fire Safety Study</i> to DPIE which is required before commencing Stage 2b works. Except for Fire Safety Study, the Principal Contractor working under Edify Energy (the applicant) has complied with requests and requirements of the Secretary for Stage 2a works.	Compliant
5.	Staging of the Development The Applicant may construct, operate and decommission the development in stages. Where staging of the development is proposed, the conditions of this consent are only required to be complied with at the relevant time and to the extent that they are relevant to the specific stage(s).	Edify letters dated 2 and 6 June 2022. DPIE letter dated 7 June 2022 <i>(Our Reference: Evidence S2-C5)</i>	Plans and various other documents describe the construction works for the DPSF occurring in several stages namely, Stage 1, Stage 2a, Stage 2b, Stage 3 and Stage 4. Where relevant, strategies plans or programs submitted for Stage 2a will be amended to reflect the Stage 2b scope of works.	Compliant
6.	Final Layout Plans Prior to the commencement of construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure.	DPIE letter dated 21 June 2022 <i>(Our Reference: Evidence S2-C5)</i>	Detailed Final Layout Plans were lodged with DPIE that included details on the location of the BESS facility. The plans were lodged prior to commencement of construction on 27 th June 2022. See Photo 1 at Appendix F .	Compliant

SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
CoA	Compliance Requirement	Evidence Sighted	Audit Findings and Recommendations	Compliance Status
	Note: If the construction of the development is to be staged, then the provision of these plans may be staged.			
7.	Upgrading of Solar Panels and Ancillary Infrastructure Over time, 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 Secretary incorporating the proposed upgrades.	Not relevant as upgrade has not occurred.	No changes to plans submitted in June 2022. The Applicant has submitted a modification for Stage 2b works to Darlington Point Substation.	Not triggered
8.	Work as Executed Plans Prior to the commencement of 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.	Stage 2a works in progress.	Works as Executed Plans for the BESS (Stage 2a) to be submitted upon completion of works. Refer to Pre-Operation Compliance Report for Darlington Point Solar Farm (dated 31/3/2022) regarding submission of Works as Executed Plans for the Solar Farm.	Not triggered
9.	Notification of Department Prior to the commencement of the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing 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 the commencement of	Letter from Edify dated 6 June 2022 Letter from Tesla dated 15 June 2022. Letters from DPIE dated 7 and 21 June 2022. <i>(Our Reference Evidence S2-C9)</i>	Edify sent a letter on 6 June 2022 notifying of the proposed staging of works associated with the BESS. DPIE acknowledged receipt of the notification on the 7 June 2022. Tesla sent a letter notifying DPIE seeking approval for the commencement of Stage 2a works scheduled for 15 June 2022.	Compliant

SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
CoA	Compliance Requirement	Evidence Sighted	Audit Findings and Recommendations	Compliance Status
	the relevant stage, and clearly identify the development that would be carried out during the relevant stage.		Letter of Approval dated 21 June 2022 from DPIE sighted in relation to commencement of BESS Stage 2a construction works	
10.	<p>Structural Adequacy</p> <p>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.</p> <p>Notes:</p> <ul style="list-style-type: none"> Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 	<p>Construction Certificate</p> <p>Stamped Plans</p> <p>Correspondence from Murrumbidgee Council</p> <p><i>(Our reference: Evidence S2-C10)</i></p>	<p>Council is the Principle Certifying Authority (PCA). A Construction Certificate was issued on 26 July for BESS Control room. Drawings sighted.</p> <p>Murrumbidgee Council emailed CPP on 12 August 2022 enclosing the Construction Certificate, stamped plans and Fire Safety Schedule for the Auxiliary & Switchgear Buildings & Spill Oil Tank. A Fire Safety Study was included in the stamped plans for the Control Building of Energy Storage System.</p> <p>The following plans have been approved by Murrumbidgee Council for the Construction Certificate:</p> <ul style="list-style-type: none"> CC8392-4 Control Room-DP Solar Farm-Consent CC8392-4 Control Room-DP Solar Farm-Fire Safety Schedule CC8392-4 Control Room-DP Solar Farm-Stamped Plans MC Notice of Commencement of Works and Appointment of PCA CC8392-5-Auxiliary Switchgear & Spill Oil Tank – DP Solar Farm - Consent 	Compliant

SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
CoA	Compliance Requirement	Evidence Sighted	Audit Findings and Recommendations	Compliance Status
			<ul style="list-style-type: none"> CC8392-5-Auxiliary Switchgear & Spill Oil Tank – DP Solar Farm – Fire Safety Schedule CC8392-5-Auxiliary Switchgear & Spill Oil Tank – DP Solar Farm – Stamped Plans MC Notice of Commencement of Works and Appointment of PCA <p>CPP has sent plans to the certifier seeking a construction certificate for the storage container yard and O&M storage containers.</p>	
11.	Demolition The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	Not applicable.	There has been no demolition work carried out on site during Stage 2a.	Not triggered
12.	Protection Of Public Infrastructure Unless the Applicant and the applicable authority agree otherwise, the Applicant must: <ul style="list-style-type: none"> (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. 	No services on site.		Not triggered

SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
CoA	Compliance Requirement	Evidence Sighted	Audit Findings and Recommendations	Compliance Status
	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			
13.	Operation of Plant and Equipment 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	Plant and Equipment Register	<p>Plant and Equipment register sighted. The register records 22 items of equipment. During the inspection observed Kuboti 5 tonne excavator; Kobelca SK135 excavator and JCB excavator 5t.</p> <p>It is evident that equipment is inspected, and records are maintained. Records indicate equipment is maintained in a proper and efficient manner (See Photo 2 at Appendix F).</p> <p>During the site inspection the maintenance records for the Kuboti 5 tonnes excavator were reviewed. The excavator was last serviced on the 10 August 2021. The excavator arrived on site on the 23 August 2022 and was checked on arrival. Records show there were no visible signs of leaks. However, the fire extinguisher was out of date and required replacement. The replacement fire extinguisher was sighted during the site inspection.</p>	Compliant
14.	BATTERIES > Battery Storage Restriction The capacity of the battery storage facility must not exceed a total: (a) delivery capacity of 200 MW; or	Construction Drawing 11291-CI-DR-01002	The Construction Drawings show the location and number of batteries systems to be stored on site. Construction plans show 116 tesla mega packs to be construction as follows:	Not triggered

SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
CoA	Compliance Requirement	Evidence Sighted	Audit Findings and Recommendations	Compliance Status
	(b) storage capacity of 400 MWh. Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage facility in the future.		<u>Delivery capacity</u> RES 1: 60 MW RES 2: 65MW DPES: 25 MW Total is 150 MW <u>Storage capacity</u> RES 1: 120 MWH Res 2: 130 MWH DPES: 50 MWH Total is 300 MW Observed on site that the construction pad is consistent the drawings. Delivery and storage of the facility can be verified during the pre-operation compliance audit.	

7.1.2 Schedule 3 – Environmental Conditions General

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
1.	Transport > Over-Dimensional and Heavy Vehicle Restrictions The Applicant must ensure that the: (a) development does not generate more than: <ul style="list-style-type: none"> 80 heavy vehicle movements a day during construction, upgrading or decommissioning; 	CPP Register of deliveries.	The solar farm works are complete (Stage 1). The only construction works onsite are construction of the BESS and associated substation. Most excavated material was kept on site for reuse. Main deliveries to site observed during the site inspection related to concrete pours.	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> 15 over-dimensional vehicle movements during construction, upgrading or decommissioning; and 10 heavy vehicle movements a day during operations; on the public road network; and <p>(b) length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 26 metres, unless the Secretary agrees otherwise</p>		<p>CCP maintains a register of all deliveries which was sighted during the site inspection. Records show on:</p> <ul style="list-style-type: none"> 12 August - 29 deliveries for imported fill from 2 August – 78 movements counted 1 August - 110 movements counted <p>The CPP tracking register shows 75 heavy vehicle movements occurred on 1 August 2022. These heavy vehicle movements were associated with the BESS project which utilized the wider road network. CPP an additional 35 heavy vehicle movements from Civil/Baida Site (an external site not within BESS/CPP footprint) located across Donald Ross Drive approximately 70m west of BESS site gate. CCP recorded their truck numbers as a precaution incase there was a complaint.</p>	
2.	<p>Transport > Over-Dimensional and Heavy Vehicle Restrictions</p> <p>The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering and leaving the site each day.</p>	N/A.	The oversized vehicles for the delivery of the transformer and three buildings are scheduled for November 2022.	Not triggered
3.	<p>Transport > Designated Over-Dimensional and Heavy Vehicle Access Route</p>	N/A.	CPP is responsible for route planning for delivery of the shed in November. TransGrid is responsible for delivery of the transformer.	Not triggered

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>All over-dimensional and heavy vehicles associated with the development must travel to and from the site via the Sturt Highway, Donald Ross Drive and the approved site access point (shown in Appendix 1).</p> <p>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.</p>		Access routes approved for use by heavy vehicles are displayed inside office in accordance with the Traffic Management Plan.	
4.	<p>Transport > Site Access</p> <p>Prior to the commencement of construction, the Applicant must upgrade the site access point off Donald Ross Drive (shown in Appendix 1) with a Rural Property Access type treatment to cater for the largest vehicle accessing the site, including sealing the on-site access road a minimum of 30 m from its intersection with Donald Ross Drive, in accordance with the Austroads Guide to Road Design (as amended by TfNSW supplements), to the satisfaction of Council.</p>	N/A	Works were done as part of the solar farm. No further upgrade works required.	Compliant
5.	<p>Transport > Operating Conditions</p> <p>The Applicant must ensure:</p> <ul style="list-style-type: none"> (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; 	<p>Construction Drawing 11291-CI-DR-01002</p> <p>Site Inspection on 14 September 2022</p>	<p>Internal BESS and substation road to be constructed with 2 coat spray.</p> <p>Observed that all project vehicles including utes and vans were parked within the designated parking area located near the office blocks.</p>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	(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.		Observed cattle grid installed at the entry/exit gate located 40 metres off Donald Ross Drive. The capacity of the roadside drain is retained.	
6.	Transport > Unformed Crown Roads The Applicant must ensure any unformed Crown road reserves affected by the development are maintained for future use, unless otherwise agreed with DPIE Crown Lands.	www.six.nsw.gov.au	The solar farm has been subdivided to create a separate site for the BESS facility known as Lot 1 DP 1249830. Review of www.six.nsw.gov.au found no unformed crown roads affecting the site.	Not triggered
7.	Transport >Traffic Management Plan Prior to the commencement of any road upgrades required under this consent, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Secretary. This plan must include: (a) details of the transport route/s to be used for all development-related traffic, including the location of access points; (b) a protocol for undertaking independent dilapidation surveys to assess the:	Dilapidation report prepared by LG Civil. Contractor sub-pack Visitor induction pack. CPP's Long induction Delivery driver induction <i>(Our reference: Evidence S3-C7)</i>	<ul style="list-style-type: none"> DPIE issued its Approval of Traffic Management Plan (Revision 1.4, dated 2 July 2022) to Edify Energy on 4 July 2022. The Dilapidation Survey of Donald Ross Drive was dated 9 June 2022 and prepared by LG Civil on behalf of CPP. The delivery driver induction includes what UHF channel to be on, requirement to stay in the vehicle and requirements for safe unloading. Armstrong sub-pack included delivery information that was sent on 26 May by email (See Photo 3) Verified induction records for Hayden Blue on 22 August 2022 and Stanley John Sandler on 25 August 2022 	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> existing condition of local roads on the transport route/s prior to construction, upgrading or decommissioning activities; and condition of local roads on the transport route/s following construction, upgrading or decommissioning activities; <p>(c) a protocol for the repair of any local roads identified in the dilapidation surveys to have been damaged during construction, upgrading or decommissioning works;</p> <p>(d) details of the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport route/s during construction, upgrading or decommissioning works, including:</p> <ul style="list-style-type: none"> performance criteria, measures and indicators for shuttle bus utilisation and car-pooling in accordance with the commitments in the EIS; temporary traffic controls, including detours and signage; notifying the local community about project-related traffic impacts; procedures for receiving and addressing complaints from the community about development-related traffic; 		<ul style="list-style-type: none"> Induction training includes rules for traffic management, loading and unloading, traffic management onsite and fatigue management. Driver's code of conduct and TMP is sent to all contractors and delivery drivers. The TMP includes detail about travel routes. ABI employs approximately 26 people. They are transported to site in 2 minibuses to reduce traffic on local road and demand for onsite parking. 	

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> minimising potential for conflict with school buses and other motorists as far as practicable; scheduling of haulage vehicle movements to minimise convoy length or platoons; responding to local climate conditions that may affect road safety such as fog, dust and wet weather; responding to any emergency repair or maintenance requirements; and a traffic management system for managing over-dimensional vehicles; <p>(e) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> travelling speeds; driver fatigue; procedures to ensure that drivers adhere to the designated transport route/s; and procedures to ensure that drivers implement safe driving practices; and <p>(f) a flood response plan detailing procedures and options for safe access to the site in the event of flooding.</p> <p>Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.</p>			
8.	<p>Transport > Land Management</p> <p>Following any construction or upgrading on the site, the Applicant must:</p>	Site inspection on 14 September 2022 and request for quotes.	CPP has plans to hydro-seed disturbed areas and was in the process of obtaining 3 quotes at the time of the Audit. Request for Quote (RFQ) had been sent to Erizon. Due to lack of	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL																												
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status																								
	(a) restore the ground cover of the site as soon as practicable; (b) maintain the ground cover with appropriate perennial species; and (c) manage weeds within this ground cover.		favourable weather conditions reinstatement of the batter for the entire BESS is yet to be completed. Prior to engaging landscaping contractor, CPP will review the seed mix to be applied on approximately 5,000m ² of disturbed areas. See Photos 4 at Appendix F.																									
9.	Biodiversity > Biodiversity Offsets Within two years of commencing construction under this consent, unless the Secretary agrees otherwise, the Applicant must retire biodiversity credits of a number and class specified in Column (a) in Table 1 below, to the satisfaction of BCS. <small>Table 1: Biodiversity Credit Requirements</small> <table><tr><th>Vegetation Community</th><th>PCT ID</th><th>Column (a): Minimum Credits Required</th><th>Column (b): Maximum Credits Required</th></tr><tr><td>Black Box grassy open woodland wetland of rarely flooded depressions in south western NSW (mainly Riverina Bioregion and Murray Darling Depression Bioregion)</td><td>PCT 16</td><td>294</td><td>294</td></tr><tr><td>Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South Western Slopes Bioregion</td><td>PCT 45</td><td>3,435</td><td>6,973</td></tr><tr><td>Yellow Box - White Cypress Pine grassy woodland on deep sandy-loam alluvial soils of the eastern Riverina Bioregion and western NSW South Western Slopes Bioregion</td><td>PCT 75</td><td>7</td><td>7</td></tr><tr><th>Species</th><th>Species ID</th><th>Credits Required</th><th>Credits Required</th></tr><tr><td>Superb Parrot (<i>Polytelis swainsonii</i>)</td><td>10645</td><td>60</td><td>60</td></tr></table> <small>Note: Following repeal of the Threatened Species Conservation Act 1995 on 25 August 2017, credits created under that Act are taken to be "biodiversity credits" under the Biodiversity Conservation Act 2016 by virtue of clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</small>	Vegetation Community	PCT ID	Column (a): Minimum Credits Required	Column (b): Maximum Credits Required	Black Box grassy open woodland wetland of rarely flooded depressions in south western NSW (mainly Riverina Bioregion and Murray Darling Depression Bioregion)	PCT 16	294	294	Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South Western Slopes Bioregion	PCT 45	3,435	6,973	Yellow Box - White Cypress Pine grassy woodland on deep sandy-loam alluvial soils of the eastern Riverina Bioregion and western NSW South Western Slopes Bioregion	PCT 75	7	7	Species	Species ID	Credits Required	Credits Required	Superb Parrot (<i>Polytelis swainsonii</i>)	10645	60	60	Not applicable.	Not applicable.	Not triggered
Vegetation Community	PCT ID	Column (a): Minimum Credits Required	Column (b): Maximum Credits Required																									
Black Box grassy open woodland wetland of rarely flooded depressions in south western NSW (mainly Riverina Bioregion and Murray Darling Depression Bioregion)	PCT 16	294	294																									
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Species	Species ID	Credits Required	Credits Required																									
Superb Parrot (<i>Polytelis swainsonii</i>)	10645	60	60																									
10.	Biodiversity > Biodiversity Offsets The retirement of credits must be carried out in accordance with the NSW Biodiversity Offsets Policy for Major Projects and can be achieved by:	Not applicable.	Not applicable.	Not triggered																								

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	(a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) providing supplementary measures			
11.	<p>Biodiversity > Biodiversity Offsets</p> <p>In the period between 2 years and 3 years from the commencement of operations, unless the Secretary agrees otherwise, the Applicant must commission an independent review of the impacts of the development on PCT45 and submit a subsequent report to the Secretary. This review and report must be undertaken by a suitably qualified, experienced and independent grasslands expert endorsed by the Secretary.</p> <p>The expert must:</p> <ul style="list-style-type: none"> (a) consult with BCS and the Applicant; (b) compare the actual impacts on PCT45 against that predicted in the EIS; (c) if the review concludes that the impacts on PCT45 are greater than that predicted in the EIS, calculate any additional biodiversity offset credit liabilities for the development over and above that specified in Column (a) of Table 1 above, in accordance with the NSW Biodiversity Offsets Policy for Major Projects, (d) document the findings in its report. 	Not applicable.	Not applicable.	Not triggered

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	If the Secretary determines, after reviewing the expert's report, that the Applicant must retire additional biodiversity credits for PCT45 , the Applicant must retire the additional credits within 12 months of the Secretary's determination, up to an aggregate maximum of that specified in Column (b) of Table 1 above.			
12.	<p>Biodiversity > Biodiversity Management Plan</p> <p>12. Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • minimising the amount of native vegetation clearing within the approved development footprint; • minimising the loss of key fauna habitat; • managing potential indirect impacts on threatened and migratory species, including: <ul style="list-style-type: none"> - flora species, including Weeping Myall Woodland and Sandhill Pine Woodland; and - fauna species, including Grey-crowned Babbler and Superb Parrot; • rehabilitating and revegetating temporary disturbance areas; 	<p>Site inspection 14 September 2022</p> <p><i>Biodiversity Management Plan</i> (Revision Final V8, dated 4 June 2019).</p> <p>Letter from DPIE to Tesla dated 15 June 2022.</p> <p><i>(Our reference: Evidence S3-C12)</i></p>	<p>DPIE approved <i>Biodiversity Management Plan</i> (Revision Final V8, dated 4 June 2019) on 15 June 2022.</p> <p>The site contains Plains Grass grassland on alluvial mainly clay soils in the Riverina and NSW Southwestern Slopes Bioregions (Plant Community Type 45). The <i>Biodiversity Management Plan</i> maps the site as PCT45 moderate.</p> <p>The site is currently managed under Edify's current Biodiversity management plan. The plan identifies the BESS infrastructure will directly affect PCT 45 and has been assessed as part of the biodiversity offset requirements.</p> <p>During the site inspection survey pegs were evident and works were confined to the survey limits.</p> <p>Edify is seeking approval to modify its existing approval to allow trenching and installation of cabling between the BESS site and the</p>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> protecting native vegetation and key fauna habitat outside the approved disturbance areas; maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and controlling weeds and feral pests; protecting and promoting the growth of native plant species (including PCT45) and controlling the growth of exotic ground cover; <p>(b) include a seasonally-based program to monitor and report on the effectiveness of these measures against the detailed performance and completion criteria; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following the Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p><i>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management</i></p>		<p>adjoining TransGrid substation. The modification includes works within PCT45. The proposed modification includes changes to the Biodiversity Management Plan.</p>	

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<i>Plan does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.</i>			
13.	<p>Amenity > Construction, Upgrading and Decommissioning Hours</p> <p>Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between:</p> <ul style="list-style-type: none"> (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. <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary:</p> <ul style="list-style-type: none"> • the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or • emergency work to avoid the loss of life, property and/or material harm to the environment. 	Interview with employees regarding construction activities.	<p>Site employees confirmed compliance with construction hours. Currently Abi employees (civil contractor) are brought on site and taken off site by bus between approved works hours.</p> <p>Edify/CCP has submitted a request to DPIE seeking approval to undertake construction activities during daytime on Saturdays and Sundays.</p>	Compliant
14.	<p>Amenity > Noise</p> <p>The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the</p>	<p>CPP noise register.</p> <p><i>(Our reference: Evidence S3-C14)</i></p>	Noisy activities observed during the site inspection included excavation with 5 tonne excavators (no rock works), deliveries, generator and concrete pours. See Photo 5 at Appendix F .	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	Interim Construction Noise Guideline (DECC, 2009), or its latest version.		<p>Noise readings have been taken at the seven receptor points identified in the CEMP and Noise Management sub plan.</p> <p>Noise readings show background noise is generally from vehicle movements and birds and construction noise is not discernable at the receptor points.</p>	
14A.	The Applicant must ensure that the noise generated by the operation of the development during the evening and night does not exceed 35 dB(A) LAeq15 min to be determined in accordance with the procedures in the NSW Noise Policy for Industry (EPA, 2017) at any non-associated residence.	Noise modelling provided as part of EA	Operation of the BESS has not commenced. Recommend compliance monitoring occur when the BESS and associated substation commence operation (Stage 3).	Not triggered
15.	<p>Amenity > Dust</p> <p>The Applicant must minimise the dust generated by the development.</p>	Site inspection on 14 September 2022	<p>Material on site is largely wet due to rainfall. Site is covered with DGS 40 and compacted. No dust observed onsite.</p> <p>Observed rumble grids installed at the site entry/exit point accessed by heavy vehicles. Observed traces of mud deposited on Donald Ross Drive due to vehicles exiting the site. Recommend ongoing monitoring and use of a mechanical street sweeping as mud tracking becomes more frequent. See Photos 6(a-d) at Appendix F.</p> <p>Speed limit sign posted along secondary access track. See Photo 6(e) at Appendix F. Also observed water cart in operation for</p>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
			suppressing dust generated during works. See Photo 6(f) at Appendix F.	
16.	Amenity > Visual The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection from the solar panels; (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.	Weekly inspection report. <i>(Our reference: Evidence S3-C16)</i>	Sighted completed copies of the Weekly Site Inspection Checklist completed. Weekly site inspection completed on 6 September 2022 identifies maintenance of SDS register and concrete wash out overflow as issues. See Photo 7 at Appendix 7.	Compliant
17.	Amenity > Lighting The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> is installed as low intensity lighting (except where required for safety or emergency purposes); does not shine above the horizontal; and complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version. 	Site inspection 14 September 2022. <i>(Our reference: Evidence S3-C16)</i>	No outdoor lighting used during out of hours, especially night time. No construction activities occur during after hours. Only indoor lights for the offices and crib rooms observed.	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
18.	<p>Heritage > Protection of Heritage Items</p> <p>Prior to the commencement of construction, the Applicant must salvage Aboriginal heritage item number AFT01 and transfer to the Griffith Local Aboriginal Land Council, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010), or its latest version.</p> <p>Note: The location of the Aboriginal heritage item referred to in this condition is shown in the figure in Appendix 1.</p>	<p>Aboriginal and Cultural Heritage Assessment (March 2018)</p>	<p>No aboriginal heritage previously recorded on the BESS site. The site already cleared prior to establishment for Stage 2a works.</p>	Not triggered
19.	<p>Heritage > Discovery of Human Remains</p> <p>If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Applicant must notify the NSW Police and Heritage NSW as soon as possible following the discovery, and work must not recommence in the area until this is authorised by Heritage NSW.</p>	<p>Signal Energy Change Finds Protocol dated March 2019 (Version 3)</p> <p><i>(Our Reference: Evidence S3-C19)</i></p>	<p>Chance Finds Protocol in place and communicated to site personnel through induction as well as onboarding. The protocol also sent to sub-contractors via email.</p> <p>Some excavation has occurred onsite but the site has largely been built up.</p>	Compliant
20.	<p>Heritage > Chance Finds Protocol</p> <p>Prior to the commencement of construction, the Applicant must prepare a Chance Finds Protocol for the development in consultation with the Aboriginal stakeholders, and to the satisfaction of Heritage NSW.</p>	<p>Signal Energy Change Finds Protocol dated March 2019 (Version 3)</p> <p><i>(Our Reference: Evidence S3-C19)</i></p>	<p>Chance Finds Protocol in place and communicated to site personnel through induction as well as onboarding. The protocol also sent to sub-contractors via email.</p> <p>Some excavation has occurred onsite but the site has largely been built up.</p>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	Following Heritage NSW's approval, the Applicant must implement the Chance Finds Protocol.			
21.	<p>Soil and Water > Water Pollution</p> <p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.</p>	<p>Site inspection on 14 September 2022.</p> <p>Dewatering Assessment in Appendix D of the CEMP.</p> <p>Water release assessment form provided as Appendix E in the CEMP.</p> <p>Erosion and Sediment Control Plan</p> <p><i>(Our reference Evidence S3-C21)</i></p>	<p>An Erosion and Sediment Control Plan prepared and maintained on site. See Photos 8(a) and 8(b) at Appendix F. A detailed plan with calculations is kept in the master file.</p> <p>Evaporation pond observed on site. See Photo 8(c) at Appendix F. Water is reused for general construction / dust suppression and moisture conditioning of material. The pond may overflow when site experiences heavy rain, especially during wet summer (Dec – Feb). At the moment a breach of the evaporation pond would result in an uncontrolled discharge of sediment laden water and therefore potentially result in water pollution. It is recommended that CPP develop procedures for the monitoring of the evaporation pond to ensure it does not overflow. If there is potential for the pond to overflow, then CPP should test and treat the water to comply with ANZECC water quality guidelines for pH and turbidity so that the water can be discharged in a controlled manner via a silt fence or silt sock.</p> <p>Concrete pours and use of a concrete washout bay was observed during the site inspection. The concrete washout pit is found to be inadequate for the containment of leftover</p>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
			concrete and spills. It is recommended that the washout pit be designed to ensure spillage does not overflow (especially during major rain event) and easily be maintained. See Photos 9(a) and 9(b) at Appendix F .	
22.	Soil and Water > Operating Conditions The Applicant must: (a) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version; (b) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and (c) implement appropriate flood management practices to ensure post-development flows from the site are limited to pre-development flows for all storms up to and including the 90-year Average Recurrence Interval event.	Construction Drawing 11291-CI-DR-01002	The Battery Pack Pads are about 100mm above ground. The surface around the pads is DGS 40, compacts and on flat ground therefore unlikely to be eroded. Substation to be gravel. BESS pad is designed to be above 1 in 100 flood event.	Compliant
23.	Hazards > Operating Conditions The Applicant must: (a) minimise the fire risks of the development; (b) ensure that the development:	Site inspection of 14 September 2022. Figure 9 BESS and RBESS Sub Defendable Space in Construction Environmental Management Plan.	Defendable space is illustrated in Figure 9 BESS and RBESS Sub Defendable Space of the Construction Environmental Management Plan.	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> includes defensible space as outlined in the EIS, that permits unobstructed vehicle access to the site; manages the defensible space as an Asset Protection Zone. complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting located adjacent to the internal access road; <p>(c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and</p> <p>(d) notify the relevant local emergency management committee following construction of the development, and prior to the commencement of operations.</p>		<p>Site has been surveyed to set out location of infrastructure. Location of fence to be surveyed so that there is 10 metres off the infrastructure for the internal defensible space. The surveyor has confirmed the survey location for some infrastructure. As built survey to occur.</p> <p>Currently a temporary 7,000 litre tank is on site as a mitigation measure. See Photo 10 at Appendix F.</p>	
24.	<p>Hazards > Fire Safety Study</p> <p>At least one month prior to the construction of the battery storage facility (excluding pre-construction minor works), unless otherwise agreed by the Secretary, the Applicant must prepare a Fire Safety Study of the development, in consultation with RFS, and to the satisfaction of FRNSW and the Secretary. The study must:</p>	<p>DPIE letter of approval for Stage 2a dated 7 June 2022 sighted.</p> <p><i>(Our reference: Evidence S3-C24)</i></p>	<p>DPIE's letter of approval for Stage 2a works requires construction works for Stage 2b must not commence unless DPIE has approved the Fire Safety Study to be prepared by the Principal Contractor or the Proponent.</p> <p>The Fire Safety Study is currently being prepared in consultation with RFS and FRNSW.</p>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>(a) be consistent with the:</p> <ul style="list-style-type: none"> Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study' guideline; and New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and <p>(b) describe the final design of the battery storage facility.</p> <p>Construction of the battery storage facility, other than pre-construction minor works, must not commence until the Secretary has approved the Fire Safety Study.</p> <p>Following the Secretary's approval, the Applicant must implement the measures described in the Fire Safety Study.</p>			
25.	<p>Hazards > Storage and Handling of Dangerous Materials</p> <p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids.</p> <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most</p>	<p>Site Inspection on 14 September 2022</p> <p>Site Emergency Plan developed by Tesla dated 7 July 2022.</p> <p><i>(Our reference: Evidence S3-C25)</i></p>	<p>Site Emergency Plan sighted in site office and lunchroom (See Photos 11(a-b) at Appendix F). Emergency contact details sighted inside office (See Photos 11(c-d) at Appendix F). Also sighted construction hazards and risks board with information displayed on the outside of office block (See Photo 12 at Appendix F).</p> <p>Dangerous goods cabinet on site designed to Australian Standard. See Photo 13 at Appendix F.</p>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	stringent requirement must prevail to the extent of the inconsistency.		<p>Acetylene and Oxygen tanks stored separately. See Photo 14 at Appendix F.</p> <p>Observed drip tray placed underneath a trailer mounted generator. See Photo 15 at Appendix F. Also sighted spill kits kept in yellow bins placed within close reach of work area. See Photo 16 at Appendix F.</p> <p>CPP maintains a company-wide master SDS register and a site specific SDS register. SDS were maintained on the master register, but some SDS were not filed on the site register. Recommend that the Site SDS register be maintained and kept up to date. See Photo 17 at Appendix F.</p>	
26.	<p>Hazards > Emergency Plan</p> <p>Prior to the commissioning of development, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with FRNSW and the RFS. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times. The plan must:</p> <p>(a) be consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's</p>	<p>DPIE letter of approval for Stage 2a dated 7 June 2022.</p> <p><i>(Our reference: Evidence S3-C26)</i></p>	<p>DPIE's approval letter dated 7 June 2022 (Ref. SSD-8392-PA-31) requires Edify Energy to submit an <i>Emergency Plan</i> that satisfies Condition 26 of Schedule 3 prior to commencement of stage 2b works. Transgrid to prepare and Emergency Plan for the substation and obtain approval from the DPIE. Tesla to submit Emergency Plan for the BESS.</p>	Not triggered

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>Planning for Bushfire Protection 2019 (or equivalent);</p> <p>(b) identify the risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;</p> <p>(c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;</p> <p>(d) list works that should not be carried out during a total fire ban;</p> <p>(e) include availability of fire suppression equipment, access and water;</p> <p>(f) include procedures for the storage and maintenance of any flammable materials;</p> <p>(g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;</p> <p>(h) include a figure showing site infrastructure, Asset Protection Zone and the fire fighting water supply;</p> <p>(i) include location of hazards (physical, chemical and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations;</p> <p>(j) include details of the location, management and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;</p> <p>(k) include bushfire emergency management planning;</p>			

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>(l) include details of how RFS would be notified, and procedures that would be implemented in the event that:</p> <ul style="list-style-type: none"> 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 proposed activities to be carried out during a bushfire danger period; and <p>(m) include details on how the battery storage facility and sub-systems can be safely isolated in an emergency.</p> <p>The Applicant must implement the Emergency Plan for the duration of the development.</p>			
27.	<p>Waste</p> <p>The Applicant must:</p> <p>(a) minimise the waste generated by the development;</p> <p>(b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version);</p> <p>(c) store and handle all waste on site in accordance with its classification;</p> <p>(d) not receive or dispose of any waste on site; and</p> <p>(e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal.</p>	<p>CPP waste register and VENM certificates (pre –classified).</p> <p>Waste dockets from Tharbogang landfill.</p> <p>Classification records for imported material.</p> <p>Geotech report for classification of spoil.</p> <p>Environmental Inspection Checklist.</p> <p>(Our reference: <u>Evidence S3-C27.1</u>)</p>	<p>Observed appropriate waste management onsite, including segregation, sorting and storage of waste. See Photos 18 at Appendix F.</p> <p>CPP undertook a cut and fill balance assessment to minimize waste. For example, excavated material from the excavation pond and pits was used to build up the site and form the batters. Topsoil is retained on site for reuse along the drainage lines and elsewhere for rehabilitation works. See Photo 19 at Appendix F.</p>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
		<p>Liquid Waste contractor PK Plumbing Supervisor Certificate.</p> <p>Sighted Waste tracker Form dated 11.10.2022 involving collection of liquid waste from CPP BESS site and then transfer to Yenda STP, Griffith Council.</p> <p>(Our reference: <u>Evidence S3-C27.2</u>)</p>	<p>Waste dockets scanned and saved in relevant folder. Waste dockets from Tharbogang landfill record the disposal of clay and excavated material from the site (see Photo 20 at Appendix F). CPP advise this material will be reused as capping material for the landfill. Boots Storage and Armstrong also received some VENM from the Site.</p> <p>Waste records show PK Plumbing (Approval No. 002/2018 by NSW Health Services) have transported sewage pumped out from the onsite toilets to Griffith Sewerage Treatment Plant.</p> <p>Housekeeping was of appropriate standard across the entire Project site.</p> <p>An electronic register of waste streams is maintained by CPP. See Photo 21 at Appendix F.</p> <p>Materials such as aggregates and road base are imported from Mawson concrete and quarries located in Griffith NSW. Mawson have provided VENM Certificates. See Photo 22 at Appendix F.</p>	
28.	Accommodation and Employment Strategy	Secretary approved the strategy on 7 June 2022	Approval of <i>Accommodation and</i>	Compliant

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL				
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>Prior to the commencement of construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> (a) propose a strategy to facilitate the accommodation of the workforce associated with the development; (b) investigate options for prioritising the employment of local workers for the construction and operation of the development where feasible; and (c) include a program to monitor and review the effectiveness of the strategy over the life of the development. <p>Following the Secretary's approval, the Applicant must implement the strategy.</p>	<p>Site interviews conducted on 14 September 2022</p> <p><i>(Our reference: Evidence S3-C28)</i></p>	<p><i>Employment Strategy</i> (Revision 1.2, 7 June 2022) provided in a letter issued to Tesla by DPIE dated 7 June 2022.</p> <p>CPP has provided a list showing names of different sub-contractors currently engaged in BESS Stage 2a project. The following contractors are based within Griffith and Murrumbidgee regions:</p> <p>Waste Collector</p> <p><i>PK Plumbing: The central depot is in Yenda, NSW with the administration office based in Darlington Point, NSW. Contractor licence, expiring on 14/06/2025 contains address 1328 Golf Course RD, Yenda NSW 2681. Supervisor's address based in Yenda as specified in the Certificate; Expiry date 19/09/2025.</i></p> <p>Bulk Earthworks</p> <p><i>Armstrong Plant Hire is based in Griffith on Farm 2430 Walla Avenue, Griffith NSW 2680. Number of personnel employed locally by Armstrong Civil on BESS includes two (2) people management team, six (6) plant operators and ten (10) people truck drivers.</i></p>	

SCHEDULE 3 – ENVIRONMENTAL CONDITIONS GENERAL														
CoA.	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status										
			<p>Civil and Concrete Works</p> <p>Abi Civil Contracting Services (NSW) Pty Ltd are a Sydney based construction company, however, has engaged local subcontractors and labour for portions of their works. There are four (4) concreters/labourers who have been locally hired. Boots Civil and HRD Ready Mix Pty Ltd are based in Leeton, which are within the Riverina region of NSW. Boots Civil consist of two (2) plant operators, two (2) labourers and two (2) excavators. HRD Readymix Pty Ltd has workforce size of ten (10) that includes 8 concrete truck drivers and 2 pump operators.</p> <p>Surveyors</p> <p>PHL Surveyors engaged in BESS project has Head Office located in 115 Yambil Street, Griffith, NSW 2680.</p> <p>https://www.phlsurveyors.com.au/contact</p>											
29.	<p>Decommissioning and Rehabilitation</p> <p>Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 2.</p> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Project site</td><td><ul style="list-style-type: none">Safe, stable and non-pollutingMinimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use</td></tr><tr><td>Solar farm infrastructure</td><td><ul style="list-style-type: none">To be decommissioned and removed, unless the Secretary agrees otherwise</td></tr><tr><td>Land use</td><td><ul style="list-style-type: none">Restore land capability to pre-existing use</td></tr><tr><td>Community</td><td><ul style="list-style-type: none">Ensure public safety</td></tr></table>	Feature	Objective	Project site	<ul style="list-style-type: none">Safe, stable and non-pollutingMinimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use	Solar farm infrastructure	<ul style="list-style-type: none">To be decommissioned and removed, unless the Secretary agrees otherwise	Land use	<ul style="list-style-type: none">Restore land capability to pre-existing use	Community	<ul style="list-style-type: none">Ensure public safety	Not applicable.	Not applicable.	Not triggered
Feature	Objective													
Project site	<ul style="list-style-type: none">Safe, stable and non-pollutingMinimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use													
Solar farm infrastructure	<ul style="list-style-type: none">To be decommissioned and removed, unless the Secretary agrees otherwise													
Land use	<ul style="list-style-type: none">Restore land capability to pre-existing use													
Community	<ul style="list-style-type: none">Ensure public safety													

7.1.3 Schedule 4 - Environmental management and reporting

SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING				
CoA	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
1.	<p>Environmental Management > Environmental Management Strategy</p> <p>Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> • keep the local community and relevant agencies informed about the operation and environmental • performance of the development; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise; • respond to any non-compliance; • respond to emergencies; and (e) include: 	<p>Construction Environmental Management Plan prepared for Stage 2a works approved by DPIE.</p> <p><i>(Our reference: Evidence S4-C1)</i></p>	<p>Letter from DPIE to Tesla dated 17 June 2022 approving Construction Environmental Management Plan for the Battery Energy Storage System (BESS) Stage 2a (Revision 1.2, 15 June 2022). See Photo 23 at Appendix F.</p>	Compliant

SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING				
CoA	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> references to any plans approved under the conditions of this consent; and a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>			
2.	<p>Environmental Management > Revision of Strategies, Plans and Programs</p> <p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> submission of an incident report under condition 4 of Schedule 4; submission of an audit report under condition 6 or 7 of Schedule 4; or any modification to the conditions of this consent. 	Not Triggered	Upgrade is defined in the consent conditions as the augmentation and/or replacement of solar panels and ancillary infrastructure on site (excluding maintenance). No upgrading or decommissioning activities on the BESS site have occurred.	Not triggered
3.	<p>Environmental Management > Updating and Staging of Strategies, Plans or Programs</p>	Noted.	Approval letter dated 7 June 2022 issued by DPIE to Edify Energy in response to Revised Staging	Compliant

SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING				
CoA	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future 		<p>Request (SSD-8392). DPIE Document Ref: SSD-8392-PA-31. See extract below:</p> <p><i>“The Department has carefully reviewed the requesting staging and is satisfied that it provides sufficient detail to meet the requirements of <u>Condition 3</u> of <u>Schedule 4</u>.</i></p> <p><i>Accordingly, the Secretary has approved the staging of the strategies, plans, programs, and sub plans associated with the construction, operation, and decommissioning of the BESS. The Secretary must approve the relevant documents as detailed in the Development Consent.”</i></p>	

SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING				
CoA	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	stages, and the trigger for updating the strategy, plan or program.			
4.	Compliance > Incident Notification The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	CPP Incident Register	<p>It was reported by the auditee that there have not been any non-compliances since the commencement of construction.</p> <p>CPP are aware of notifying DPIE within 4 hours of an unplanned event occurring unless otherwise agreed upon. The project has a SQE Event Reporting Matrix that indicates the response required and whom must be contacted when an unplanned event occurs.</p> <p>One incident has been recorded on the incident register. The incident was damage to an internal fence because of moving machinery. The incident did not cause or potentially cause any harm to the environment and therefore was not a reportable incident.</p>	Not triggered
5.	Compliance > Non-compliance Notification The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	CPP Incident Register	CPP have not identified any non-compliances to date.	Not triggered
5A.	Compliance > Non-compliance Notification 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	Not applicable	Not applicable.	Not triggered

SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING				
CoA	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	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.			
5B.	Compliance > Non-compliance Notification A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Not applicable	Not applicable	Not triggered
6.	Compliance Reporting > Compliance Reporting The Applicant must provide regular compliance reporting to the Department on the development, excluding the battery storage facility, in accordance with the relevant Compliance Reporting requirements (DPE 2018).	Not applicable	Not applicable	Not triggered
7.	Independent Environmental Audit Independent Audits of the development of the battery storage facility must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.	This Independent Environmental Audit (IEA) report.	This IEA report has been prepared within 3 months of commencing construction. The construction of the BESS commenced on 21 June 2022. DPIE issued letter of appointment for the independent audit to Edify Energy on 12 July 2022 and the audit was conducted on 14 September. This Independent Audit report will be submitted by the 9 November 2022 which is within 2 months of completion of audit.	Compliant

SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING				
CoA	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
			It is noted that another IEA is due within 3 months of commencing operation.	
7A	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	As above	As above	Compliant
7B	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 7 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	As above	As above	Compliant
7C	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 7 of Schedule 4 of this consent, or condition 7B of Schedule 4 where notice is given by the Planning Secretary (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. unless otherwise agreed by the Planning Secretary.	As above	As above	Compliant
7D	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit	As above	As above	Compliant

SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING				
CoA	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.			
7E	Notwithstanding the requirements of the Independent Audit Post Approvals 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.	As above	As above	Compliant
No. 8	Access To Information The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> the EIS; the final layout plans for the development; current statutory approvals for the development; approved strategies, plans or programs required under the conditions of this consent; the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; how complaints about the development can be made; a complaints register; 	Edify is the Applicant and project related documents can be found at: https://edifyenergy.com/project/darlington-point/ See Photo 24 Documents and Plans relevant to stage 1 works are available on Edify's website. Documents relevant to BESS Stage 2a works are available on major project portal under Department Planning but require uploading of the latest versions/revisions held by CPP. In particular, the Biodiversity Management Plan approved by DPIE on 15 June 2022 may have undergone amendment resulting in a new document specific to BESS. There is a dedicated webpage for	Key management plans such as CEMP, AES, TMP, EMP, BMP and final layout plans for Stage 2a have been uploaded on Edify's website during the audit period and preparation of this audit report. However, the Biodiversity Management Plan available on Edify's website for the BESS project is not the approved version. In reference to the approval letter dated 15 Jun 2022, DPIE approved Ver 8.0 of Biodiversity Management Plan, dated 4 Jun 2019 which is not available on Edify's website under BESS project. It is also a requirement to upload corresponding approval letters on proponent's website. Refer to Table 5 under Recommendations and Improvement Opportunities. Also, see Table 6 below in Appendix A for further details.	Compliant

SCHEDULE 4 – ENVIRONMENTAL MANAGEMENT AND REPORTING				
CoA	Compliance Requirement	Evidence Collected	Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> compliance reports; any independent environmental audit, and the Applicant's response to the recommendations in any audit; and any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	BESS project on Edify's website which contains BESS Biodiversity Management Plan instead of the approved version available on Major project portal.		

7.1.4 Incident notification and reporting requirements

No.	Written Incident Notification Requirements	Evidence collected	Audit Findings and Recommendations	Compliance Status
1.	A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 4 of Schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred.	No reportable incidents have occurred to date.	Not Applicable	Not triggered
2.	Written notification of an incident must: <ol style="list-style-type: none"> 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); identify how the incident was detected; identify when the applicant became aware of the incident; identify any actual or potential non-compliance with conditions of consent; 	Not applicable	Not Applicable	Not triggered

No.	Written Incident Notification Requirements	Evidence collected	Audit Findings and Recommendations	Compliance Status
	f. describe what immediate steps were taken in relation to the incident; g. identify further action(s) that will be taken in relation to the incident; and h. identify a project contact for further communication regarding the incident.			
3.	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant 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.	Not Applicable	Not Applicable	Not triggered
4.	The Incident Report must include: a. summary of the incident; b. outcomes of an incident investigation, including identification of the cause of the incident; c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d. details of any communication with other stakeholders regarding the incident.	Not Applicable	Not Applicable	Not triggered

TABLE 6

Document Name	Version issued to Subcontractor #	Version available on Edify's Website	Version available on Major Project Portal
Accommodation and Employment Strategy (AES) Stage 2a, BESS	Rev 1.3, dated 7 Jul 2022	Rev 1.7, dated 17 Oct 2022	Rev 1.2, dated 7 Jun 2022
Traffic Management Plan (TMP) Stage 2a, BESS	Rev 1.5, dated 7 Jul 2022	Rev 1.8, dated 19 Oct 2022	Rev 1.3, dated 20 Jun 2022
Construction Environmental Management Plan (CEMP) Stage 2a, BESS	Rev 1.3, dated 7 Jul 2022	Rev 1.6, dated 19 Oct 2022	Rev 1.2, dated 15 Jun 2022
Biodiversity Management Plan (BMP)	Ver 8.0, dated 4 Jun 2019 (Solar Farm)	Rev 0, dated 27 May 2022 (BESS)	Ver 8.0, dated 4 Jun 2019 (Solar Farm)
Emergency Management Plan (EMP), BESS	Rev 0.3, dated 7 Jul 2022	Rev 0, dated 13 Feb 2022	Not available.
Final Layout Plans, BESS	Available for issue.	Available on website	Not available.

3 Aug 2021 – versions of relevant plans distributed to subcontractor.

Appendix B

Planning Secretary Audit Team Agreement

7.2 Appendix B - Planning Secretary audit team agreement

Department of Planning and Environment



Ms Jane Gibson
EDIFY ENERGY PTY. LTD.
34-35 SOUTH STEYNE
MANLY NSW 2095

12/07/2022

Dear Ms Gibson

Darlington Point Solar - (SSD-8392)
Independent Environment Audit – Team Request 2022

I refer to your request (SSD-8392-PA-5) submitted to the Department of Planning and Environment (the department) on 11 July 2022, for the Secretary's approval of suitably qualified persons to undertake the Independent Environment Audit (IEA) and prepare the IEA report for Darlington Point Solar – BESS (the project) in accordance with Schedule 4 condition 7(a) of SSD-8392 (the consent), as modified.

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. In accordance with Schedule 4 condition 7A of the consent and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team from Urban Perspectives:

- Mr Stuart Wilmot (Lead Auditor) and
- Mr Wassef Hussain (assisting Auditor)

Please ensure this correspondence is appended to the Independent Audit Report. This approval is conditional on the auditors being independent of the project

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

In accordance with Schedule 4 condition 7D of the consent, the IEA report 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 Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.

Department of Planning and Environment



Should you wish to discuss the matter further, please contact Katrina O'Reilly on 0429400261 or at compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "K. O'Reilly", on a light blue background.

Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix C

Consultation

7.3 Appendix C – Consultation

7.3.1 Murrumbidgee Council

Wassef Hussain

From: Wassef Hussain
Sent: Tuesday, 6 September 2022 2:51 PM
To: mail@murrumbidgee.nsw.gov.au
Cc: Admin; Stuart Wilmot
Subject: Independent Environmental Audit - BESS Facility Darlington Solar Farm
Attachments: Independent Env Audit SSD 8392 Letter to Murrumbidgee Council.pdf

Dear John,

Please find a letter attached herewith in relation to an independent environmental audit planned to be undertaken by Urban Perspectives at BESS facility, Darlington Solar Farm located in Murrumbidgee local government area.

Kind regards,

Wassef Hussain

Senior Environmental Consultant
Urban Perspectives | Suite 405, Level 4, 88 Foveaux Street, Surry Hills NSW 2010
GPO Box 4507 Sydney NSW 2001

P: + 61 2 8071 4587 | M: 0451 881 529
E: wassef@urbanperspectives.com.au



Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

6 September 2022

John Scarce
The General Manager
Murrumbidgee Council
E: mail@murrumbidgee.nsw.gov.au

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear John,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We will conduct the audit on 13 September 2022 in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm Regards,

W.A. Hussain

Wassef Hussain
Senior Environmental Consultant/ Assisting Auditor SSD 8392
Urban Perspectives
M+61 451 881 529; E: wassef@urbanperspectives.com.au

7.3.2 NSW Department of Planning and Environment, Div. of Resources and Geoscience (GSNSW)



Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

The Manager - Land Use

NSW Department of Planning and Environment

Division of Resources and Geoscience (GSNSW)

E: landuse.minerals@geoscience.nsw.gov.au

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Manager,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm regards,

Stuart Wilmot

Principal / Lead Auditor

Urban Perspectives

M+61 425 227 246 | E: stuart@urbanperspectives.com.au

7.3.3 NSW Environment Protection Authority



Suite 405/88 Foveaux Street
Sunny Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

The Manager

Regional Operations Riverina Far West Region South & West Branch

NSW Environment Protection Authority

E: craig.bretherton@epa.nsw.gov.au; riverina.farwest@epa.nsw.gov.au

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Manager,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm regards,

Stuart Wilmot

Principal / Lead Auditor

Urban Perspectives

M+61 425 227 246 | E: stuart@urbanperspectives.com.au

NSW Environment Protection Authority (cont...)**Wassef Hussain**

From: Stuart Wilmot
Sent: Sunday, 8 January 2023 9:26 AM
To: Wassef Hussain
Subject: Fwd: Independent Environmental Audit - BESS Facility Darlington Solar Farm
Attachments: image001.png; SSD 8392 Stage 2a To EPA NSW_ Dec 2022 (002).pdf

Sent from my iPhone

Begin forwarded message:

From: Nick Van Lijf <Nicholas.VanLijf@epa.nsw.gov.au>
Date: 22 December 2022 at 8:41:46 am AEDT
To: Stuart Wilmot <stuart@urbanperspectives.com.au>
Subject: RE: Independent Environmental Audit - BESS Facility Darlington Solar Farm

CAUTION: This email originated from outside of the organization. **DO NOT CLICK** links or open attachments unless you recognize the sender and know the content is safe.

Hi Stuart,

I refer to the below email and attached letter requesting input from the NSW Environment Protection Authority (EPA) on the Independent Environmental Audit being undertaken by Urban Perspectives for the Battery Energy Storage System (BESS) project forming part of the Darlington Point Solar Farm located in Darlington Point (SSD 8392).

We have reviewed the request and note that the subject premises do not hold an environment protection licence under the *Protection of the Environment Operations Act 1997*. Further, the EPA understands that the project is not being undertaken by or on behalf of a NSW Public Authority nor are the subject activities other activities for which the EPA is the appropriate regulatory authority.

In view of these factors, the EPA has no comments to provide in relation to this matter and no follow-up consultation is required.

If you have any questions or concerns about this matter, please do not hesitate to contact me.

Kind regards,

Nick van Lijf
Operations Officer
Regulatory Operations
NSW Environment Protection Authority
D 02 6969 0704 | M 0499 688 394



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the

NSW Environment Protection Authority (cont...)

*world's oldest surviving culture, we pay our respect
to Aboriginal elders past, present and emerging.*

Report pollution and environmental
incidents 131 555 or +61 2 9995 5555

From: Stuart Wilmot <stuart@urbanperspectives.com.au>
Sent: Monday, 19 December 2022 12:18 PM
To: craig.bretherton@epa.nsw.gov.au; EPA West Operations Regional Mailbox
<EPA.Westopsregional@epa.nsw.gov.au>
Subject: Independent Environmental Audit - BESS Facility Darlington Solar Farm

Dear Manager,

Please find a letter attached herewith in relation to an independent environmental audit planned to be undertaken by Urban Perspectives at BESS facility, Darlington Solar Farm located in Murrumbidgee local government area.

Kind regards,

Stuart Wilmot

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately. Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Environment Protection Authority.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

7.3.4 NSW Aboriginal Land Council - Griffith



Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

Mr. Robert Carroll
Chief Executive Officer
5 Wiradjuri Place NSW 2680
PO Box 8043 EAST GRIFFITH NSW
T: 02 6962 6711

E: griffalac@bigpond.com

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Robert,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warms Regards,

Stuart Wilmot
Principal / Lead Auditor
Urban Perspectives
M+61 425 227 246 | E: stuart@urbanperspectives.com.au

7.3.5 Heritage Division, NSW Office of Environment and Heritage



Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

The Manager

Customer Strategies team, Heritage Division

NSW Office of Environment and Heritage

T: 9873 8500 | E: heritagemailbox@environment.nsw.gov.au

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Manager,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm regards,

Stuart Wilmot

Principal / Lead Auditor

Urban Perspectives

M+61 425 227 246 | E: stuart@urbanperspectives.com.au

Heritage Division, NSW Office of Environment and Heritage (cont...)**Wassef Hussain**

From: Stuart Wilmot
Sent: Sunday, 22 January 2023 1:36 PM
To: Wassef Hussain
Subject: Fwd: Independent Environmental Audit - BESS Facility Darlington Solar Farm

FYI
Sent from my iPhone

Begin forwarded message:

From: Caitlin Stevens <Caitlin.Stevens@environment.nsw.gov.au>
Date: 22 January 2023 at 7:19:58 am GMT+7
To: Stuart Wilmot <stuart@urbanperspectives.com.au>
Subject: RE: Independent Environmental Audit - BESS Facility Darlington Solar Farm

CAUTION: This email originated from outside of the organization. **DO NOT CLICK** links or open attachments unless you recognize the sender and know the content is safe.

Dear Stuart,

Thank you for your email. There are no community concerns, complaints on issues registered with Heritage NSW in relation to the SSD 8392 BESS Facility, Darlington Point Solar Farm.

Kind regards,
Caitlin

Caitlin Stevens
Senior Assessment Officer
Heritage NSW
Department of Planning and Environment
T (02) 9895 6582 E Caitlin.Stevens@environment.nsw.gov.au

<https://www.environment.nsw.gov.au/topics/heritage>

4 Parramatta Square, 12 Darcy Street
Parramatta, NSW, 2150

Working days Wednesday, Thursday and Friday



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Heritage Division, NSW Office of Environment and Heritage (cont...)

Please consider the environment before printing this email.

From: Stuart Wilmot <stuart@urbanperspectives.com.au>
Sent: Monday, 19 December 2022 12:18 PM
To: OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>
Subject: Independent Environmental Audit - BESS Facility Darlington Solar Farm

Dear Manager,

Please find a letter attached herewith in relation to an independent environmental audit planned to be undertaken by Urban Perspectives at BESS facility, Darlington Solar Farm located in Murrumbidgee local government area.

Kind regards,

Stuart Wilmot

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment, Energy and Science.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

7.3.6 Department of Industry Lands and Water Division, NSW Department Primary Industries



Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

The Manager

NSW Department of Industry Lands and Water Division

Relevant branches of Lands & Water and Department of Primary Industries

E: landuse.enquiries@dpi.nsw.gov.au

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Manager,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warms Regards,

Stuart Wilmot

Principal / Lead Auditor

Urban Perspectives

M+61 425 227 246 | E: stuart@urbanperspectives.com.au

Department of Planning and Environment – Water (the Department) cont....**Department of Planning and Environment**

Our ref: OUT22/22301

Name: Stuart Wilmot
Suite 405/88 Foveaux Street
Surry Hills NSW 2010
Email: stuart@urbanperspectives.com.au

Date: 19 December 2022

Subject: **Energy Storage System - Darlington Point Solar Farm - Independent Environmental Audit (SSD-8392)**

Dear Stuart,

I refer to your request seeking advice from the Department of Planning and Environment – Water (the department) on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

The department understands that the scope of the audit as outlined under the development consent and the reference guideline, “*Independent Audit Post Approval Requirements (2020)*” extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
 - Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance based reporting.

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124

www.dpie.nsw.gov.au

Department of Planning and Environment – Water (the Department) cont....**Department of Planning and Environment**

- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DPE Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink, appearing to read "S Francis".

Simon Francis
Senior Project Officer
Water Assessments
Department of Planning and Environment – Water
T 0428 926 117 | E simon.francis@dpie.nsw.gov.au

7.3.7 Southwest Branch, Regional Operations, Office of Environment and Heritage

Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

The Team Leader

South West Branch, Regional Operations

Office of Environment and Heritage

T: (02) 6022 0607

E: npws.riverina@environment.nsw.gov.au; miranda.kerr@environment.nsw.gov.au

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Manager,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm's Regards,

Stuart Wilmot

Principal / Lead Auditor

Urban Perspectives

M+61 425 227 246 | E: stuart@urbanperspectives.com.au

Southwest Branch, Regional Operations, Office of Environment and Heritage (cont..)

From: Stuart Wilmot <stuart@urbanperspectives.com.au>
Sent: Monday, 19 December 2022 12:18 PM
To: NPWS Area Mailbox - Riverina <npws.riverina@environment.nsw.gov.au>; Miranda Kerr <Miranda.Kerr@environment.nsw.gov.au>
Subject: Independent Environmental Audit - BESS Facility Darlington Solar Farm

Dear Manager,

Please find a letter attached herewith in relation to an independent environmental audit planned to be undertaken by Urban Perspectives at BESS facility, Darlington Solar Farm located in Murrumbidgee local government area.

Kind regards,

Stuart Wilmot

From: Miranda Kerr <Miranda.Kerr@environment.nsw.gov.au>
Sent: Wednesday, 21 December 2022 9:59 AM
To: Stuart Wilmot <stuart@urbanperspectives.com.au>
Cc: NPWS Area Mailbox - Riverina <npws.riverina@environment.nsw.gov.au>; ROG South West Region Mailbox <rog.southwest@environment.nsw.gov.au>
Subject: RE: Independent Environmental Audit - BESS Facility Darlington Solar Farm

CAUTION: This email originated from outside of the organization. **DO NOT CLICK** links or open attachments unless you recognize the sender and know the content is safe.

Hi Stuart

Thanks for getting in touch.

Could you please send through the scope of the audit so that we can provide relevant feedback?

Please also specify which stage of the BESS is being audited. I understand that Mod 2 (BESS connection, laydown area and subdivision) was approved on 31 October 2022 and that it is being staged. We have recently (9 December) commented on the draft Biodiversity Management Plan for Stage 2b(ii) but have not reviewed any other stage BMP.

Just to make sure you have contacted the relevant people, I am in the South West Planning team of the Biodiversity and Conservation Division (BCD) of DPE. BCD is separate to both the National Parks and Wildlife Service and Heritage Division. Heritage Division is responsible for Aboriginal cultural heritage matters. We are not really across community concerns or complaints as mentioned in your letter. Our role is regulatory advice about biodiversity and flood planning.

Below are the correct contact details for our team. If you let me know who provided the out-of-date details used in your letter and email, I can ensure that any future requests will be going to the right place.

Andrew Fisher
Senior Team Leader, Planning - South West
Biodiversity and Conservation Division
Via email: rog.southwest@environment.nsw.gov.au (cc'ed)

Kind regards

Miranda Kerr (she/her)
Senior Biodiversity Conservation Officer, South West

Biodiversity and Conservation | Department of Planning and Environment
T 02 6022 0607 | M 0407 752 822 | E miranda.kerr@environment.nsw.gov.au
512 Dean St ALBURY | PO Box 1040 ALBURY NSW 2640 | www.dpie.nsw.gov.au

Working hours: Tuesday to Friday, 9 am – 5 pm

Contact the South West Planning Team about biodiversity and flood management planning matters by emailing rog.southwest@environment.nsw.gov.au

Southwest Branch, Regional Operations, Office of Environment and Heritage (cont..)

From: Wassef Hussain <wassef@urbanperspectives.com.au>

Sent: Wednesday, 21 December 2022 12:43 PM

To: Stuart Wilmot <stuart@urbanperspectives.com.au>; ROG South West Region Mailbox <rog.southwest@environment.nsw.gov.au>; Miranda Kerr <Miranda.Kerr@environment.nsw.gov.au>

Subject: RE: Independent Environmental Audit - BESS Facility Darlington Solar Farm

Hi Miranda,

Thanks for your response and directing us to the relevant section of your team. I have now included Andrew in our correspondence. As I was drafting up the letter, I referred to the EIS document where I came across your contact details. By the way, I am assisting Stuart with the Independent Environmental Audit being conducted on BESS facility of Darlington Point Solar Farm (SSD-8392-Mod-1) development. The audit relates to **Stage 2a** – site preparation for the BESS and does not cover Stage 1 (construction and operation of the solar farm) of the SSD. The solar farm is now operational and works associated with the Darlington Point Solar Farm (Stage 1) are not covered in this audit. Please refer to the Audit scope and Objectives texted in blue.

As a reference, I have attached the Biodiversity Management Plan that DPIE had approved for **Stage 2a** BESS facility. I am also sending you a copy of Modification 1 Consolidated Consent which contains the aspects of Biodiversity under Conditions 9, 10, 11 and 12 of Schedule 3 – *Environmental Conditions General*. It appears that

most of the conditions are not triggered by **Stage 2a** of the SSD. We also note that the biodiversity offsets are the responsibility of the Darlington Point Solar Farm stage (Stage 1) of the Development.

Southwest Branch, Regional Operations, Office of Environment and Heritage (cont..)

Table: Consent Conditions relevant to Biodiversity Management

CoA.	Compliance Requirement	Compliance Status																								
Schedule 3 - No. 9	<p>Biodiversity > Biodiversity Offsets</p> <p>Within two years of commencing construction under this consent, unless the Secretary agrees otherwise, the Applicant must retire biodiversity credits of a number and class specified in Column (a) in Table 1 below, to the satisfaction of BCS. [See Tab Table 1]</p> <p><i>Table 1: Biodiversity Credit Requirements</i></p> <table><tr><th>Vegetation Community</th><th>PCT ID</th><th>Column (a): Minimum Credits Required</th><th>Column (b): Maximum Credits Required</th></tr><tr><td>Black Box grassy open woodland wetland of rarely flooded depressions in south western NSW (mainly Riverina Bioregion and Murray Darling Depression Bioregion)</td><td>PCT 16</td><td>294</td><td>294</td></tr><tr><td>Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South Western Slopes Bioregion</td><td>PCT 45</td><td>3,435</td><td>6,973</td></tr><tr><td>Yellow Box - White Cypress Pine grassy woodland on deep sandy-loam alluvial soils of the eastern Riverina Bioregion and western NSW South Western Slopes Bioregion</td><td>PCT 75</td><td>7</td><td>7</td></tr><tr><th>Species</th><th>Species ID</th><th>Credits Required</th><th>Credits Required</th></tr><tr><td>Superb Parrot (<i>Polytelus swainsonii</i>)</td><td>10645</td><td>60</td><td>60</td></tr></table> <p><i>Note: Following repeal of the Threatened Species Conservation Act 1995 on 25 August 2017, credits created under that Act are taken to be "biodiversity credits" under the Biodiversity Conservation Act 2016 by virtue of clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</i></p> <p>Note: Following repeal of the Threatened Species Conservation Act 1995 on 25 August 2017, credits created under that act are taken to be "biodiversity credits" under the Biodiversity Conservation Act 2016 by virtue of clause 22 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017</p>	Vegetation Community	PCT ID	Column (a): Minimum Credits Required	Column (b): Maximum Credits Required	Black Box grassy open woodland wetland of rarely flooded depressions in south western NSW (mainly Riverina Bioregion and Murray Darling Depression Bioregion)	PCT 16	294	294	Plains Grass grassland on alluvial mainly clay soils in the Riverina Bioregion and NSW South Western Slopes Bioregion	PCT 45	3,435	6,973	Yellow Box - White Cypress Pine grassy woodland on deep sandy-loam alluvial soils of the eastern Riverina Bioregion and western NSW South Western Slopes Bioregion	PCT 75	7	7	Species	Species ID	Credits Required	Credits Required	Superb Parrot (<i>Polytelus swainsonii</i>)	10645	60	60	<div><input type="checkbox"/> Compliant</div> <div><input type="checkbox"/> Non-Compliant</div> <div><input type="checkbox"/> Not Triggered</div>
Vegetation Community	PCT ID	Column (a): Minimum Credits Required	Column (b): Maximum Credits Required																							
Black Box grassy open woodland wetland of rarely flooded depressions in south western NSW (mainly Riverina Bioregion and Murray Darling Depression Bioregion)	PCT 16	294	294																							
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Species	Species ID	Credits Required	Credits Required																							
Superb Parrot (<i>Polytelus swainsonii</i>)	10645	60	60																							
Schedule 3 - No. 10	<p>Biodiversity > Biodiversity Offsets</p> <p>The retirement of credits must be carried out in accordance with the NSW Biodiversity Offsets Policy for Major Projects and can be achieved by:</p> <p>(a) acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) providing supplementary measures.</p>	<div><input type="checkbox"/> Compliant</div> <div><input type="checkbox"/> Non-Compliant</div> <div><input type="checkbox"/> Not Triggered</div>																								
Schedule 3 - No. 11	<p>Biodiversity > Biodiversity Offsets</p> <p>In the period between 2 years and 3 years from the commencement of operations, unless the Secretary agrees otherwise, the Applicant must commission an independent review of the impacts of the development on PCT45 and submit a subsequent report to the Secretary. This review and report must be undertaken by a suitably qualified, experienced and independent grasslands expert endorsed by the Secretary.</p> <p>The expert must:</p> <p>(a) consult with BCS and the Applicant; (b) compare the actual impacts on PCT45 against that predicted in the EIS; (c) if the review concludes that the impacts on PCT45 are greater than that predicted in the EIS, calculate any additional biodiversity offset credit liabilities for the development over and above that specified in Column (a) of Table 1 above, in accordance with the NSW Biodiversity Offsets Policy for Major Projects, (d) document the findings in its report.</p> <p>If the Secretary determines, after reviewing the expert's report, that the Applicant must retire additional biodiversity credits for PCT45, the Applicant must retire the additional credits within 12 months of the Secretary's determination, up to an aggregate maximum of that specified in Column (b) of Table 1</p>	<div><input type="checkbox"/> Compliant</div> <div><input type="checkbox"/> Non-Compliant</div> <div><input type="checkbox"/> Not Triggered</div>																								

Southwest Branch, Regional Operations, Office of Environment and Heritage (cont..)

Schedule 3 - No. 12(a)	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • minimising the amount of native vegetation clearing within the approved development footprint. • minimising the loss of key fauna habitat; • managing potential indirect impacts on threatened and migratory species, including: <ul style="list-style-type: none"> – flora species, including Weeping Myall Woodland and Sandhill Pine Woodland; and – fauna species, including Grey-crowned Babbler and Superb Parrot; • rehabilitating and revegetating temporary disturbance areas; • protecting native vegetation and key fauna habitat outside the approved disturbance areas; • maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and • controlling weeds and feral pests; • protecting and promoting the growth of native plant species (including PCT45) and controlling the growth of exotic ground cover; 	<input type="checkbox"/> Compliant <input type="checkbox"/> Non-Compliant <input type="checkbox"/> Not Triggered
Schedule 3 - No. 12(b)	(b) include a seasonally-based program to monitor and report on the effectiveness of these measures against the detailed performance and completion criteria; and	
Schedule 3 - No. 12(c)	(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.	
Schedule 3 - No. 12(d)	<p>Following the Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.</p>	

Audit Scope and Objectives

In accordance with the Consolidated Development Consent for SSD 8392 dated 22 October 2021 and the NSW Department of Planning, Industry & Environment's (DPIE) Independent Audit – Post Approval Requirements dated May 2020 (Independent Audit Requirements), the proponent [Edify Energy] is required to complete the first independent post approval environmental audit within three (3) months of commencing construction; and within 3 months of commencement of operations.

*The scope and objectives of the independent audit surrounding **Stage 2a – Site preparation for the BESS** is to assess Edify Energy Pty Ltd. compliance with:*

- all conditions of the Development Consent for **SSD 8392**, including modifications (dated 22 Oct 2021) to the original determination instrument (dated 7 Dec 2018).
- all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans and
- all environmental licences and approvals applicable to the development excluding environment protection licences issued under the Protection of the Environment Operations Act 1997.

Schedule 4 of the consolidated consent outlines the environmental management and reporting requirements for the development of the battery storage facility. Condition No. 7 provides the following:

Independent Audits of the development of the battery storage facility must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency:

- within 3 months of commencing construction.*
- within 3 months of commencement of operations.*

Southwest Branch, Regional Operations, Office of Environment and Heritage (cont..)

PROPONENT	<i>Edify Energy Pty Ltd.</i>
PRINCIPAL CONTRACTOR	<i>Consolidated Power Projects Australia Pty Ltd (CPP)</i>
CLIENT (BESS COMPONENT)	<i>Tesla</i>
KEY PERSONNEL	<i>Luke Perabo – Project Manager Jarrod Erbs – Safety, Quality & Environment Manager Liam Chambers – Site Manager</i>
PROJECT	<i>Darlington Point Solar Farm SSD 8392</i>
SUBJECT	<i>Stage 2a Site Preparation for the Riverina Battery Energy Storage System (BESS) Post Approval Independent Environmental Audit 1</i>
AUDIT PERIOD	<i>Independent Audit 1</i>
AUDITORS	<i>Stuart Wilmot, Lead Auditor Wassef Hussain, Assisting Auditor</i>
AUDITOR ORGANIZATION	<i>Urban Perspectives</i>
AUDITOR SELECTION	<i>Appointed by DPIE in accordance with Schedule 4 condition 7(a) of SSD-8392 (the consent), as modified</i>
INSPECTION SITES	<i>BESS facility of the Darlington Point Solar Farm, Darlington Point, Murrumbidgee Local Government Area</i>

Thanks, and please let us know if you would like to discuss this further.

Wassef

Southwest Branch, Regional Operations, Office of Environment and Heritage (cont..)**Wassef Hussain**

From: Miranda Kerr <Miranda.Kerr@environment.nsw.gov.au>
Sent: Wednesday, 21 December 2022 1:59 PM
To: Wassef Hussain
Cc: Stuart Wilmot; ROG South West Region Mailbox
Subject: RE: Independent Environmental Audit - BESS Facility Darlington Solar Farm

CAUTION: This email originated from outside of the organization. **DO NOT CLICK** links or open attachments unless you recognize the sender and know the content is safe.

Thanks Wassef

We will digest the information and get back to you in the new year if there are any questions.

Regards

Miranda Kerr (she/her)
Senior Biodiversity Conservation Officer, South West

Biodiversity and Conservation | Department of Planning and Environment
T 02 6022 0607 | M 0407 752 822 | E miranda.kerr@environment.nsw.gov.au
512 Dean St ALBURY | PO Box 1040 ALBURY NSW 2640 | www.dpie.nsw.gov.au

Working hours: Tuesday to Friday, 9 am – 5 pm

Contact the South West Planning Team about biodiversity and flood management planning matters by emailing rog.southwest@environment.nsw.gov.au



The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

7.3.8 Fire and Rescue NSW



Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

The Manager/Team Leader
Community Safety Directorate
Fire Safety Assessment Unit, Fire & Rescue NSW
E: firesafety@fire.nsw.gov.au

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Manager/Team Leader,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm regards,

Stuart Wilmot
Principal / Lead Auditor
Urban Perspectives
M+61 425 227 246 | E: stuart@urbanperspectives.com.au

7.3.9 NSW Rural Fire Services (RFS)



Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

The Manager/Team Leader
NSW Rural Fire Service (RFS)
Planning and Environment Services (North)
E: pes@rfs.nsw.gov.au

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Manager/Team Leader,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm regards,

Stuart Wilmot
Principal / Lead Auditor
Urban Perspectives
M+61 425 227 246 | E: stuart@urbanperspectives.com.au

7.3.10 RMS, Transport for NSW (TfNSW)

Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4587 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

The Director / Manager - Land Use
Roads and Maritime Services (Southwest Region) NSW
T: (02) 6923 6611 | E:

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Director / Manager,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm regards,

Stuart Wilmot
Principal / Lead Auditor
Urban Perspectives
M+61 425 227 246 | E: stuart@urbanperspectives.com.au

7.3.11 Transgrid



Suite 405/88 Foveaux Street
Surry Hills NSW 2010
P: + 61 2 8071 4567 | M: 0425 227 246
admin@urbanperspectives.com.au
www.urbanperspectives.com.au

15 December 2022

Michelle Stone

Media and Communications Manager - Major Projects

Transgrid

180 Thomas Street, Sydney NSW 2000

E: michelle.stone@transgrid.com.au

M: 0438 293 917

Re: Independent Environmental Audit SSD 8392 BESS Facility, Darlington Point Solar Farm

Dear Michelle,

Urban Perspectives has been appointed as the Independent Environmental Auditor by the Department of Planning, Industry and Environment (DPIE) for the Battery Energy Storage System (BESS) project located in Darlington Point Solar Farm (SSD 8392). The project is part of state significant development and is subject to modified conditions of consent issued on 22 October 2021. We are currently undertaking an audit in accordance with the *Guidelines for Independent Audit Post Approval Requirements 2020*.

We would appreciate if you let us know whether there have been any issues, concerns or complaints raised by the community. Also, if you would like us to raise any issue pertaining to the project, we will incorporate that into our scope of audit.

We would appreciate your comments by the **25th January 2023** so that we can submit our audit report to Department of Planning and Environment – Compliance by the 31st January 2023.

Thanks, and if you have any questions, please do not hesitate to contact me.

Warm regards,

Stuart Wilmot

Principal / Lead Auditor

Urban Perspectives

M+61 425 227 246 | E: stuart@urbanperspectives.com.au

7.4 Appendix D - Independent audit declaration form

Declaration of Independence - Auditor	
Project Name	Darlington Point Solar Farm
Consent Number	SSD 8392 Modification 1
Description of Project	Battery Energy Storage System
Project Address	336 Donald Ross Drive, Darlington Point, NSW 2706
Proponent	Tesla Motors Pty Ltd.
Date	14 September 2022


I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an

- approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Proposed Auditor	1. Stuart Wilmot - Principal Auditor; 2. Wassef Hussain - Assisting Auditor	
Signature		<i>W.A. Hussain</i>
Qualification	BSc, MURP, Registered Planner	B Env Eng, MURP
Company	Urban Perspectives	

7.5 Appendix E - Technical specialists reports

Appendix F

Site Inspection Photographs (14 September 2022)

7.6 Appendix F - Site inspection photographs

LIST OF PHOTOGRAPHS

The photographs were taken during site audit on 14 September 2022 at the BESS facility located next to the Darlington Point Solar Farm off Donald Ross Drive. Findings relevant to the Consent Conditions as provided in the Compliance Tracking Table make references to the list of photos below.

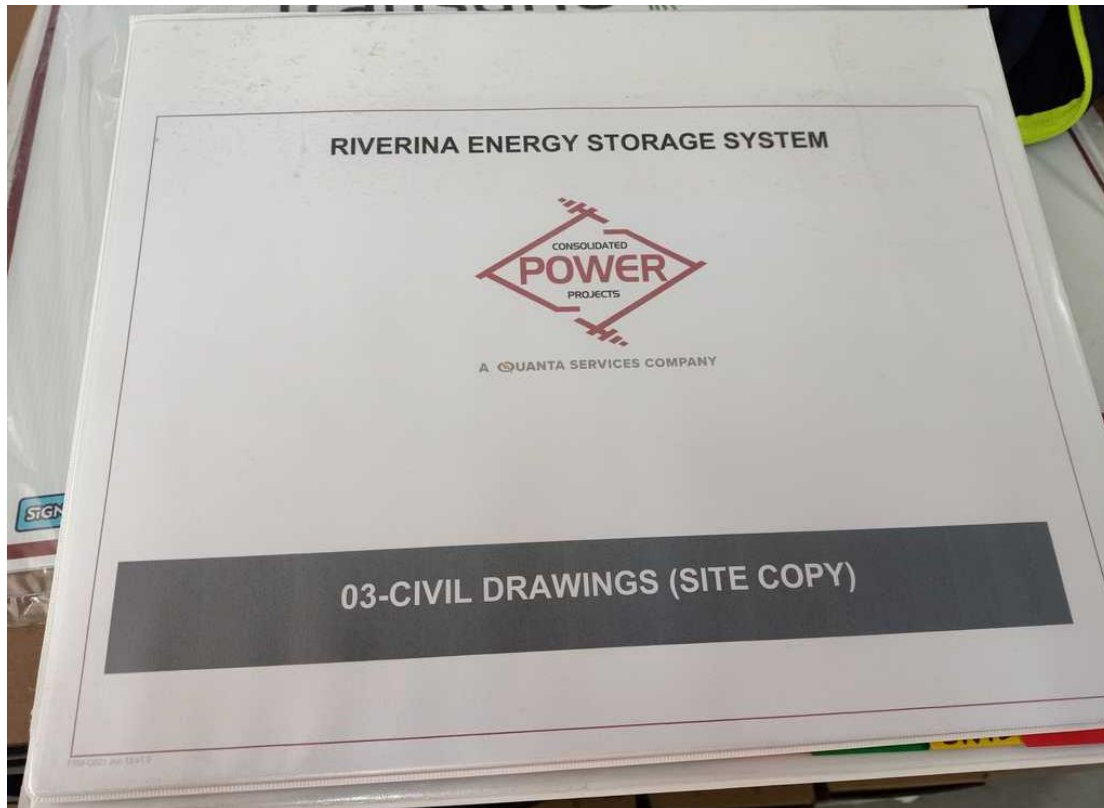
Photo 1 – Approved Final Layout Plans (Civil Drawings) issued for construction kept in site folder

Photo 2 – Pre start safety checks conducted daily on mobile plant

8328 OPERATOR'S DAILY PRE-START INSPECTION CHECKLIST

REGISTRATION OF MACHINE: 5T KUBOTA
 SERIAL NUMBER: JSAB0168
 MAKE OF MACHINE: KUBOTA

DATE: 12/9/22
 TIME: 6:40 AM
 PLANT NO: P92
 COORDINATOR: [Signature]

ITEMS TO BE INSPECTED EACH DAY IN ACCORDANCE WITH THE MANUFACTURER'S OPERATION MANUAL TO ENSURE THAT THE MACHINE IS IN SAFE WORKING ORDER

(To be filled out daily and submitted to the workshop weekly for review)

Select which inspection items are applicable to your machine and mark below in the following manner:

ITEM	Machine inspection	MON	TUE	WED	THUR	FRI	SAT	SUN
1	WINDOWS – Visibility, Washers, Wipers, Mirrors	✓	✓	✓				
2	CABIN – Access/Egress, Seating, Seatbelts	✓	✓	✓				
3	ENGINE – Oil, Water, Belts, Leaks	✓	✓	✓				
4	HYDRAULICS – Fluid, Hoses, Connections, Rams, Leaks	✓	✓	✓				
5	FRAME/BODY – Cracks, Wear	✓	✓	✓				
6	TRACKS – Pins, Excessive Wear (condition), Pressure	✓	✓	✓				
7	WHEELS – Tyres, Nuts, Damage, Wear (condition), Pressure	✓	✓	✓				
8	DRIVE COUPLINGS – Condition	✓	✓	✓				
9	GAUGES/CONTROLS – Brakes, Steering, Warnings	✓	✓	✓				
10	CHAINS/ROPES – Condition, Lubed	✓	✓	✓				
11	WINCHES – Ropes, Brakes	✓	✓	✓				
12	FIRE EXTINGUISHER – Availability, Tested	✓	✓	✓				
13	FIRST AID KIT – Availability, Contents	✓	✓	✓				
14	SAFETY ITEMS – Warning Alarms, Flashing lights, Horns	✓	✓	✓				
15	ATTACHMENTS – Quickhitch Pins & Lock Buckets, Chains, Forks, Hydraulic Hammer, Buckets, Ring Feeder, Air Fittings	✓	✓	✓				
16	PUMPS – Leaks, Condition, Valves	✓	✓	✓				
17	DAILY OPERATING HOURS							
18	DAILY KILOMETRES							
19	OTHER (Specify)							

Operators Signature: [Signature] Date: 12/9/22

PLANT FAULT / DEFECT REPORT: Reported By: [Signature] Reported to: [Signature]

To be used to report any fault of defect identified during the daily machine safety checks or operations

DETAILS OF FAULT/DEFECT:

Signature: [Signature] Date: 12/9/22

If "Lock-Out" is required, has machine been "Tagged" to prevent further use until repaired?

DETAILS OF REPAIR: Repairs carried out on site immediately: YES/NO

Defect Rectified (YES/NO) on: [Signature] Name: [Signature]

White Copy – Workshop Blue Copy – Safety Officer Yellow Copy – Remains in Book



Photo 3 - Email dispatch containing relevant plans and onboarding information for Subcontractor**Wassef Hussain**

From: Erbs, Jarrod
Sent: Thursday, 26 May 2022 11:19 AM
To: 'Tom Armstrong'
Cc: Perabo, Luke; Chambers, Liam; To, Nick
Subject: Armstrong subby Pack to complete for DP BESS 11291
Attachments: 11291 Construction Environmental Management Plan - Rev 0.pdf; 11291 Emergency Management Plan - Rev 0.2.pdf; 11291 Management Plan Appendices - Rev 0.pdf; 11291 Project Management Plan - Rev 0.1.pdf; 11291 Risk Register 1.0.xlsx; 11291 Traffic Management Plan - Rev 0.2.pdf; 11291 Work Health and Safety Management Plan - Rev 0.1.pdf; CAZ Map.pdf; contractor onboarding HSE Portal.pdf; Emergency contact details.pdf; GEN-C010 Subcontractor Pack.pdf; PLN-S001 COVID-19 Management Plan.pdf; 11291 Accommodation and Employment Strategy - Rev 0.1.pdf

Hi Tom

Please find attached a number of documents to assist in the completion of the WHS CPP Subcontractor Project Pack. This is regarding the onboarding of Armstrong's at the DP Bess project

CPP have attached the following documents as per page 7 subcontractor project pack attached.

- Subcontractor project pack
- Emergency Management Plan
- Management Plan Appendices
- Quality Management Plan
- WHS Management Plan
- CAZ Map
- Risk Register
- Emergency Management site contact details

Subby Pack pages to fill in please:

- Please fill out pages 16 with your company details.
- Return an email to CPP with the requested documents i.e your SWMS etc.. on pages 16 and 17
- Sign page 17
- Fill out page 18 yes/no questions
- Sign page 18

All licences and plant documentation is to be uploaded in the new CPP HSE Portal. You don't email CPP with this information. CPP have attached a user guide on how to download it and implement.

Any questions- please email me.

Regards,
Jarrod Erbs
 SQE Advisor
 Consolidated Power Projects Australia Pty Ltd

Mobile: 0400280585

Photos 4 – Utilisation of Catch Drains to Capture Runoff From Disturbed Areas and Direct Runoff into Evaporation Pond. Batter treatment Recommended Along Diversion Drain



Photo 5 – Noise Monitoring Readings Recorded and Kept In Master Register.

<div>Home</div> <div> Project Name: Riverina Energy Storage System Project Number: 11291 Site Manager: Liam Chambers SQE Advisor: Jarrod Erbs </div>							
Date/Time	Project Name	Project Number	Name of Person Completing Sound Testing	Location of Sound Testing	Sound Levels (dB)	Observations during test	Work being conducted on-site
PLEASE NOTE: Newly Purchased Sound tester purchased in June and did not arrive to site until the first week in July. All tests conducted for 2 Mins at the entrance way to the Residential receivers (Mailbox) for 15 min duration.							
July							
23/07/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 1	49.4dB	2x Cars passing on the Sturt highway during test, Birds squawking	general construction work taking place on site
23/07/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 2	65.5dB	Galah's squawking, Birds chirping.	general construction work taking place on site
23/07/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 3	42.5dB	Galah's squawking, Birds chirping.	general construction work taking place on site
23/07/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 4	46.6dB	Tractor/harvester operating on near by Binda farm with reverse squawker	general construction work taking place on site
23/07/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 5	40.7dB	Roosters Crowing, Birds squawking/chirping	general construction work taking place on site
23/07/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 6	38.5dB	Birds squawking/chirping	general construction work taking place on site
23/07/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 7	46.1dB	Birds squawking/chirping	general construction work taking place on site
23/07/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 8	95.7dB	Passing B-double on Sturt Highway	general construction work taking place on site
July							
20/08/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 1	75.4dB	car passing on highway	general construction work taking place on site
20/08/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 2	53.5dB	sheep x 10	general construction work taking place on site
20/08/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 3	41.5dB	birds	general construction work taking place on site
20/08/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 4	46.6dB	Birds squawking/chirping	general construction work taking place on site
20/08/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 5	40.7dB	mixed birds chirping.	general construction work taking place on site
20/08/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 6	38.5dB	Birds squawking/chirping	general construction work taking place on site
20/08/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 7	46.1dB	Birds squawking/chirping	general construction work taking place on site
20/08/2022	Riverina Energy Storage System	11291	Liam Chambers	Location 8	76.1dB	1 x car passing	general construction work taking place on site



Time Period		
Days (7:00 to 18:00 weekdays / 8:00 to 13:00 Saturday)		
Receiver	Background Noise Level (RBL), LA90	Noise Management Level (NML), LAeq(15-minute)
Residential	30	40
Commercial	70	
Industrial	75	

Note: 1 – Section 3.1.2 of the NSW INP states that where measured background noise levels are below 30 dB(A), background noise levels should be set to 30 dB(A)

Photo 6(a) Cattle grid, collecting mud/dirt at site entry/exit to BESS compound off Donald Ross Drive

Photos 6(b) – Vehicle turning area inside site compound likely to result in mud tracking on public roads



Photos 6(c) – Mud tracking at the vehicle turning bay off Donald Ross Drive

Photo 6 (d) – Sediment laden water collected in a nearby swale situated between vehicle access track and site perimeter off Donald Ross Drive.

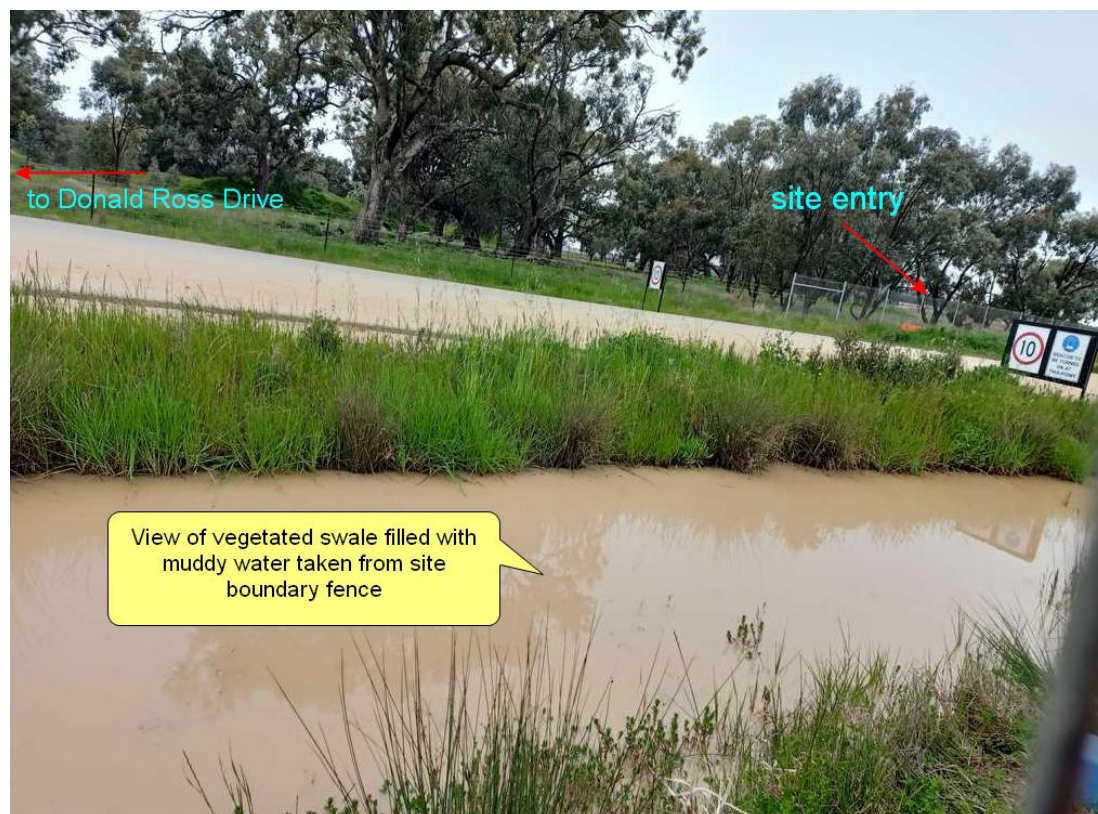


Photo 6(e) Speed Limit sign posted along secondary access track**Photo 6(f) – Water cart in operation for dust suppression**

Photo 7 – Weekly Site Inspection Conducted During Construction

Weekly Site Inspection											
Project Name:	Riverina Energy Storage System			Project Number:	11291			Date:	08/07/22		
CPP person conducting inspection:	Liam Chambers			Signature:				Sub-Contractor Representative:	Signature:		
Brief description of works being completed during inspection: Bulk Earthworks											
Condition Codes: C = Conforming, PC = Partial Conformance, NC = Non-Conforming, NA = Not Applicable											
Instructions: This form shall be utilised for inspections of the site WHS, Environmental, and Quality Assurance status of the work site. This inspection will be conducted by the Site Manager or delegate and Representatives from Sub-Contractor work groups where applicable											
Items	C	PC	NC	NA	Comments	Items	C	PC	NC	NA	Comments
Housekeeping						General					
Bins emptied regularly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Front Lift Bin emptied 12/07/22	Adequate/ suitable PPE for task	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Site offices clean and tidy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Emergency siren tested and working correctly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tested during Emergency Response Review 01/07/2022
Kitchen / Tea room area clean and tidy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Notice boards in place and used	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Adequate drinking water	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4x Neverfail coolers and bottles delivered 15/06/22	WHS registers reviewed and amended i.e. SWMS / Permits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Toilets clean and tidy, hand wash / toilet paper available	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Fire extinguishers tagged and in date / register up to date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fire extinguishers test tagging booked 11/07/2022
Storage of materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		First aid kits stocked and in prominent position	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CPP Site office/CPP Vehicles
Work areas free from trip hazards	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		SDS's reviewed / registers up to date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Refuse / Scrap removed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Correct stacking of materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Tools and Equipment					
Barricading erected / maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Tools and equipment correctly stored	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All site and construction signs, flagging and bunting erected / maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ATF fencing erected around construction zone 15/06/22	Electrical equipment tested and tagged / register up to date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All electrical items test tagged 05/07/2022
Sharp objects capped i.e. star pickets / no bar	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	Lifting equipment tested and tagged / register up to date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All lifting equipment inspected 05/07/2022
Electrical leads elevated above floor where practical	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		Ladders in good condition / register up to date	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All ladders inspected 04/07/2022

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Page 1 of 5

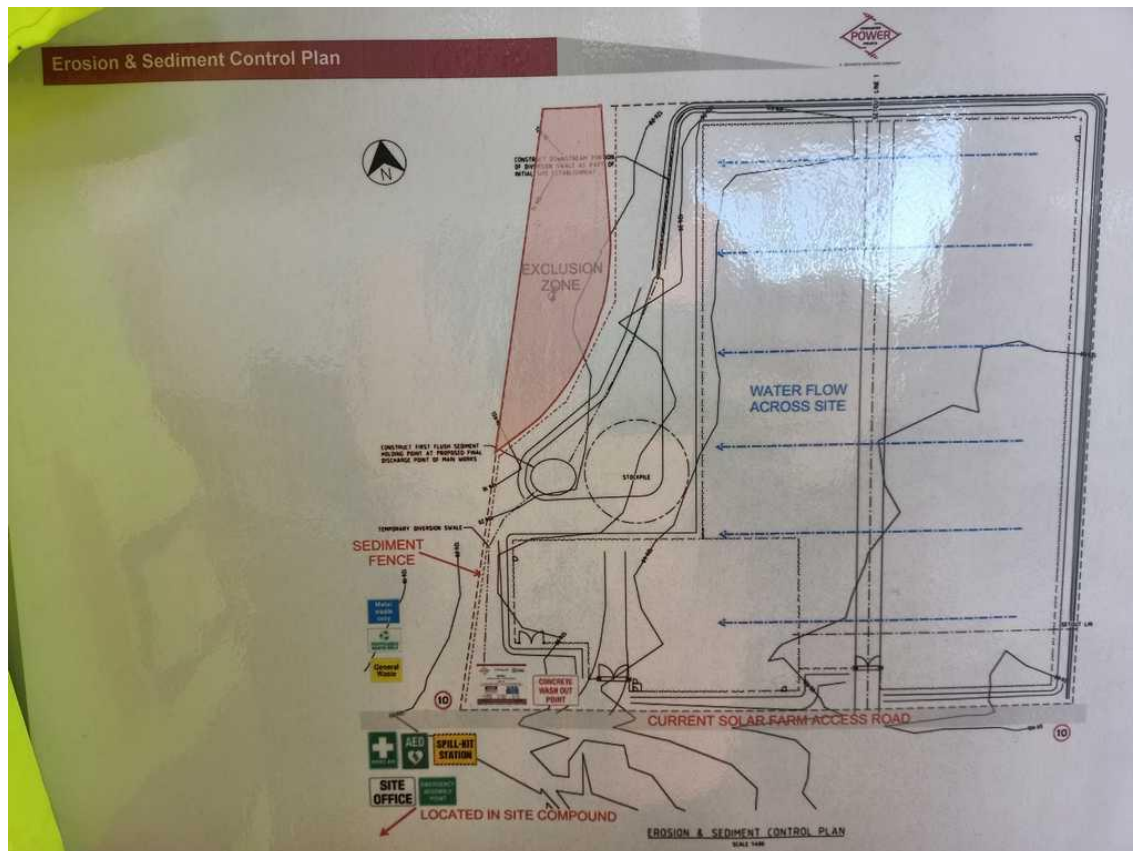
Photo 8(a) Erosion and Sediment Control Plan displayed on Project Noticeboard inside office.

Photo 8(b) – Sediment fence installed along site boundary



Photo 8(c) – Utilisation of Evaporation Pond to Capture Runoff from Disturbed Areas



Photo 9(a) – Concrete washout pit with lining material – requires maintenance



Photo 9(b) – Concrete pour observed during site audit



Photo 10 – Onsite water storage comprising 7,000 litre tank for responding to any fires on site. A larger capacity tank 20,000 litres has been approved and will be in place prior to stage 2b commencement.



Photos 11(a) – Copies of Emergency Management Plan, including other information kept in master file and (b) inside site office noticeboard

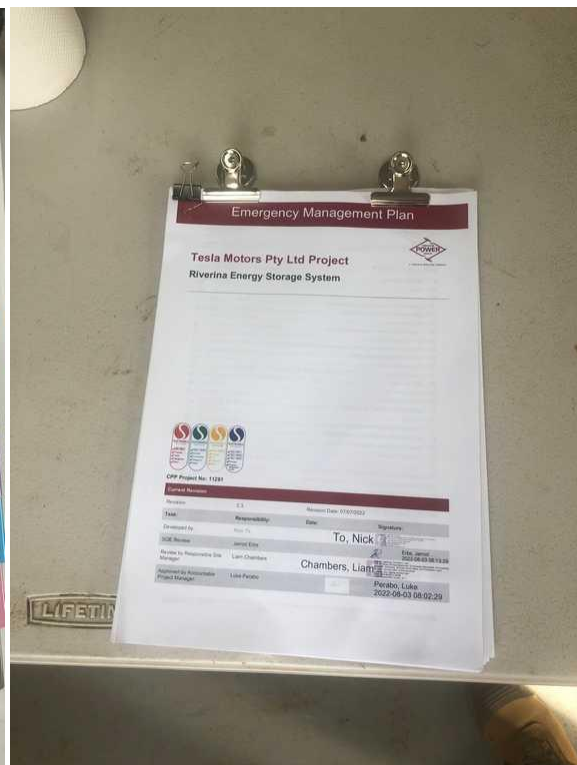
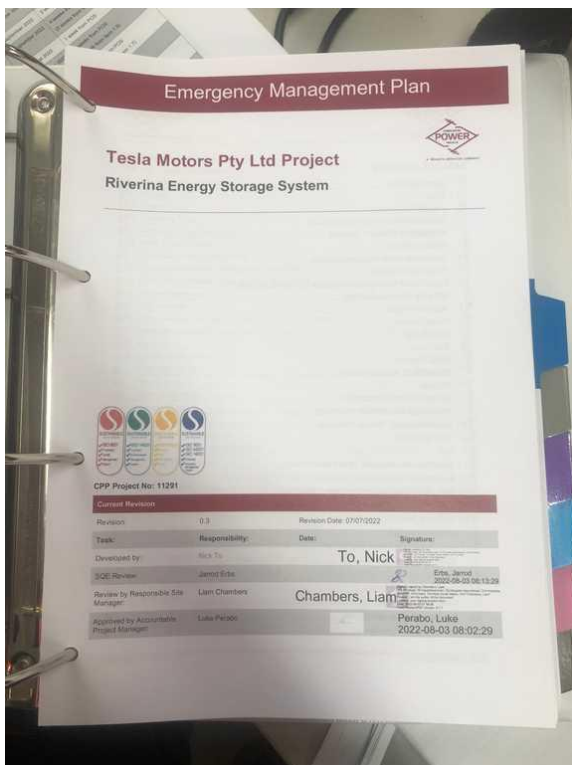


Photo 11(c) Emergency contact details also illustrated in Site Layout Plan.



Photo 11(d) – Emergency contact details displayed inside site office

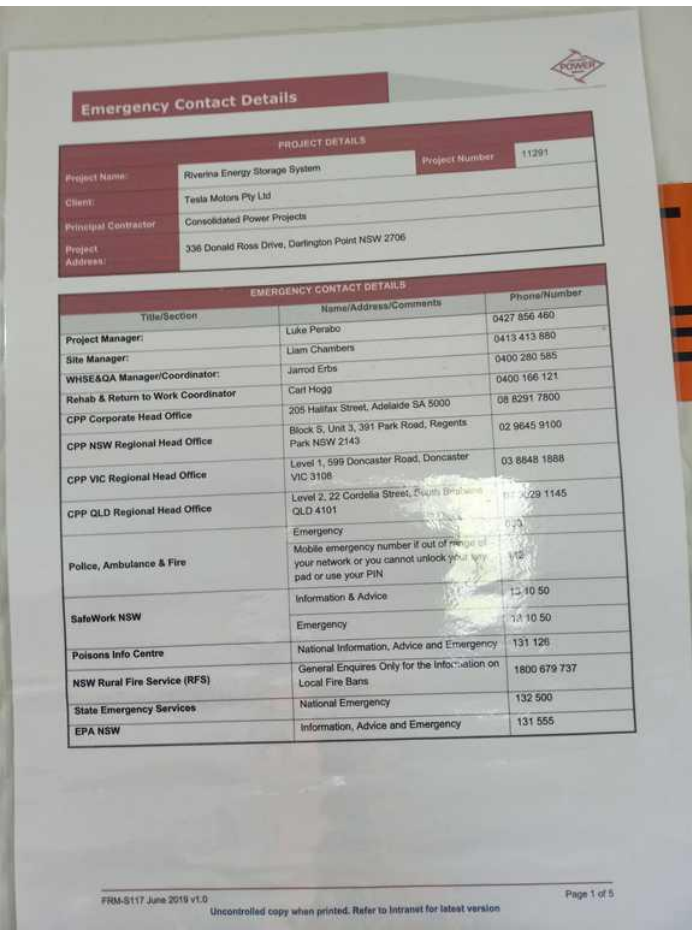


Photo 12 - Information relating to hazards displayed on Project Construction Board. Also includes CPP's commitments to environmental quality, safety and environment aimed at reinforcing HSE awareness among site personnel.



Photo 13 – Chemicals such as paints, oil, sprays, etc stored inside self-contained cabinet**Photo 14 – Oxyacetylene Cylinder in caged compartment**

Photo 7– Spill containment measure underneath diesel generator**Photo 16 – Adequately stocked spill kit was noted to be present within close reach of work area**

Photo 8 – Safety Data Sheets kept in master file

Safety Data Sheet

NON-Hazardous, NON-Dangerous Goods

1. MATERIAL AND SUPPLY COMPANY IDENTIFICATION

Product name: **FOSROC CONCURE A99**

Synonyms:
Concure A99 20L
Concure A99 100L
Concure A99 Black Tint 100L
Fosroc Concure A99 20L
Fosroc Concure A99 205L
Fosroc Concure A99 1000L

Product Code
900909
900910
FC000909-20L
FC000909-205L
FC000909-1000L

Bar Code
9300221079765
9300221079701
9300221079770

Recommended use: Spritz applied concrete curing compound.

Supplier:
Blatchem Construction Supplies Pty Ltd/Fosroc
ABN: 62 069 961 948
Street Address:
7 Wyndham Road
Wyong NSW 2259
Australia
Telephone:
(02) 4350 9000
Emergency Telephone number: Australia – 1800 033 111 New Zealand – 0640 734 607

2. HAZARDS IDENTIFICATION

Based on available information, this material is not classified as hazardous according to criteria of Safe Work Australia.

Poison Schedule: Not Applicable

DANGEROUS GOOD CLASSIFICATION

Not classified as Dangerous Goods by the criteria of the "Australian Code for the Transport of Dangerous Goods by Road & Rail" and the "New Zealand NZS5433: Transport of Dangerous Goods on Land"

3. COMPOSITION INFORMATION

CHEMICAL ENTITY

Ingredients determined to be non-hazardous or below reporting limits

CAS NO

PROPORTION
100 % (w/w)
100%

4. FIRST AID MEASURES

If poisoning occurs, contact a doctor or Poisons Information Centre (Phone Australia 131 126, New Zealand 0800 764 766).

Inhalation: Remove victim from exposure - avoid becoming a casualty. Remove contaminated clothing and loosen remaining clothing. Allow patient to assume most comfortable position and keep warm. Keep at rest until medical attention.

Product Name: **FOSROC CONCURE A99**

Version: 2.0

Reference No: **PARGHSE000183**

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Issued: 22 August 2020

Photos 9- Source separated waste skips in laydown area and near site office



Photo 19 - Topsoil retained for reuse

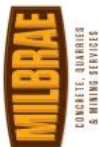


Photo 20 - Waste transported to Tharbogang Landfill, Griffith. Shown below some tipping docketts obtained following waste disposal.

TAX INVOICE	TAX INVOICE	TAX INVOICE	TAX INVOICE
Griffith City Council Tharbogang Landfill Griffith NSW 2680 ABN : 81274100792	Griffith City Council Tharbogang Landfill Griffith NSW 2680 ABN : 81274100792	Griffith City Council Tharbogang Landfill Griffith NSW 2680 ABN : 81274100792	Griffith City Council Tharbogang Landfill Griffith NSW 2680 ABN : 81274100792
Transaction No. 388537 Transaction Type: Second weigh Date : 14/07/2022 Time : 08:57	Transaction No. 388531 Date In : 14/07/2022 Time In : 07:47 Date Out: 14/07/2022 Time Out: 08:20	Transaction No. 388528 Date In : 14/07/2022 Time In : 07:35 Date Out: 14/07/2022 Time Out: 08:10	Transaction No. 388526 Date In : 14/07/2022 Time In : 07:30 Date Out: 14/07/2022 Time Out: 08:06
Operator : CAMERON Rego No. : XN24RDCS Product : CLEAN FILL Direction : IN Destination: CLEAN FILL SITE Customer : ARMSTRONGS PLANT HIR	Operator : CAMERON Rego No. : XN9196 Product : CLEAN FILL Direction : IN Destination: CLEAN FILL SITE Customer : ARMSTRONGS PLANT HIR	Operator : CAMERON Rego No. : XN45 Product : CLEAN FILL Direction : IN Destination: CLEAN FILL SITE Customer : ARMSTRONGS PLANT HIR	Operator : CAMERON Rego No. : XN39GR Product : CLEAN FILL Direction : IN Destination: CLEAN FILL SITE Customer : ARMSTRONGS PLANT HIR
Gross : 44.40 t Tare : 17.82 t Net : 26.58 t Min. Cost Under 0.02t: \$ 0.00 Price Per Tonne : \$ 0.00 Total : \$ 0.00 GST : \$ 0.00 Amount Due : \$ 0.00 (ex. levies) Price to Pay: \$ 0.00 Paid By : ACCOUNT	Gross : 47.02 t Tare : 18.04 t Net : 28.98 t Min. Cost Under 0.02t: \$ 0.00 Price Per Tonne : \$ 0.00 Total : \$ 0.00 GST : \$ 0.00 Amount Due : \$ 0.00 (ex. levies) Price to Pay: \$ 0.00 Paid By : ACCOUNT	Gross : 47.56 t Tare : 17.14 t Net : 30.42 t Min. Cost Under 0.02t: \$ 0.00 Price Per Tonne : \$ 0.00 Total : \$ 0.00 GST : \$ 0.00 Amount Due : \$ 0.00 (ex. levies) Price to Pay: \$ 0.00 Paid By : ACCOUNT	Gross : 43.02 t Tare : 16.70 t Net : 26.32 t Min. Cost Under 0.02t: \$ 0.00 Price Per Tonne : \$ 0.00 Total : \$ 0.00 GST : \$ 0.00 Amount Due : \$ 0.00 (ex. levies) Price to Pay: \$ 0.00 Paid By : ACCOUNT
Driver Signature _____	Driver Signature _____	Driver Signature _____	Driver Signature _____

Photo 21 - Waste register maintained electronically by CPP showing quantity and types of wastes generated from construction. (page 1 of 4)

Project Name: Riverina Energy Storage System		Project Number: 11291		Site Manager: Liam Chambers		SQE Advisor: Jarrod Erbs				
Note: All loads will be inspected by a CPP representative (or their delegate) prior to leaving site										
Date & Time (of inspection)	Load Inspected by	Vehicle Rego	Waste Type	Regulated Waste Code (if applicable)	Disposal (Disp) Point - Full address (Must be approved site)	Disp Cert (Y/N)	Disp Cert Ref No.	Volume		Comments
5/07/2022	11:00 AM	Liam Chambers	BB83LM	General waste		YENDA/THARBOGANG LANDFILL			100%	4.5M3 General Waste Front lift bin (MIA QUIKSKIPS)
13/07/2022	4:10 PM	Liam Chambers	XN39DG	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	288522	100%	25.32 Clean material removed from site due to unsuitability for required compaction requirements
13/07/2022	4:10 PM	Liam Chambers	XN48DG	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388528	100%	30.42 Clean material removed from site due to unsuitability for required compaction requirements
13/07/2022	4:40 PM	Liam Chambers	XN91TO	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388531	100%	28.98 Clean material removed from site due to unsuitability for required compaction requirements
13/07/2022	4:50 PM	Liam Chambers	XO93GR	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388526	100%	26.32 Clean material removed from site due to unsuitability for required compaction requirements
13/07/2022	11:45am	Rod Cusbert	XN24RF	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388537	100%	26.58 Clean material removed from site due to unsuitability for required compaction requirements
14/07/2022	9:30am	Rod Cusbert	XN48DG	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388545	100%	33.74 Clean material removed from site due to unsuitability for required compaction requirements
14/07/2022	9:35am	Rod Cusbert	XN91TO	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388547	100%	29.5 Clean material removed from site due to unsuitability for required compaction requirements
14/07/2022	9:45am	Rod Cusbert	XO93GR	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388548	100%	23.46 Clean material removed from site due to unsuitability for required compaction requirements
14/07/2022	10:25am	Rod Cusbert	XN39DG	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388556	100%	31.82 Clean material removed from site due to unsuitability for required compaction requirements
14/07/2022	11:30am	Rod Cusbert	XO93GR	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388569	100%	25.66 Clean material removed from site due to unsuitability for required compaction requirements
14/07/2022	11:45am	Rod Cusbert	XN48DG	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388567	100%	32.12 Clean material removed from site due to unsuitability for required compaction requirements
14/07/2022	11:50am	Rod Cusbert	XN91TO	VENM material		GRIFFITH CITY COUNCIL THARBOGANG LANDFILL	Y	388568	100%	30.33 Clean material removed from site due to unsuitability for required compaction requirements

Photo 22 - VENM Certificate for importing fill material to BESS site**To Whom It May Concern**1st June 2022

SOURCE: Milbrae Hillview Quarry
MATERIAL: 40mm FCR,

VENM PRODUCT STATEMENT

Milbrae Hillview Quarry is a quartz conglomerate (a sedimentary rock type) resource, supplying 'inert' quarry products. All products are produced from 100% overburden and 'VENM – Virgin Excavated Natural Material', which is drilled, blasted and extracted from within quarry confines. Products are utilised by an array of customers for various civil applications, including road pavements capping material, general backfill and building foundations.

Hillview Quarry does not import waste products or mine mullock that could potentially contaminate it's VENM products.

Any clients of Milbrae, project or EPA Representatives, are always welcome to inspect the quarry confines, source material, extraction and processing operations.

For any further assistance, please don't hesitate to call.

regards,

Ian Hamilton
 Senior Construction Materials Engineer
 PO Box 669
 Griffith, NSW 2680
 T: 02 69667501 M: 0407248046
 www.milbrae.com.au | i.hamilton@milbrae.com.au

E.B. Mawson & Sons Pty Ltd trading as Mawsons Concrete & Quarries and Milbrae Concrete, Quarries & Mining Services
 Registered Office: 141 King George Street, Cohuna VIC 3568
 ABN: 14 004 519 617
 Toll Free: 1800 423 456

To Whom it may concern

Date: 05/09/2022
SOURCE: Milbrae Western Riverina Quarry
MATERIAL: Aggregates and Roadbases

VENM PRODUCT STATEMENT

Milbrae's Western Riverina Quarry is a basalt resource, supplying 'inert' quarry products. All products are produced from 100% 'VENM – Virgin Excavated Natural Material', which is drilled, blasted and extracted from within quarry confines.

Products are utilised by an array of customers for various civil applications, including road pavements, Road Bases and concretes.

Western Riverina Quarry does not import waste products or mine mullock that could potentially contaminate it's VENM products.

Any clients of Milbrae, project or EPA Representatives, are always welcome to inspect the quarry confines, source material, extraction and processing operations.

For any further assistance, please don't hesitate to call.

regards,

Ian Hamilton
 Senior Construction Materials Engineer
 PO Box 669
 Griffith, NSW 2680
 T: 02 69667501 M: 0407248046
 www.milbrae.com.au | i.hamilton@milbrae.com.au

HEAD OFFICE 141 KING GEORGE ST
 COHUNA VICTORIA 3568
 TEL (03) 5456 2409 FAX (03) 5456 2428
 E.B. MAWSON & SONS PTY. LTD. ABN 14 004 519 617

Photo 23 - Approval of Environmental management Strategy (EMS) /CEMP by DPIE for Stage 2a works.

Department of Planning and Environment



Our ref: SSD-8392-PA-22

Nurudeen Huthman
Project Manager
Tesla Motors
via email

17/06/2022

**Subject: Construction Environmental Management Plan -
Darlington Point Solar Farm project – BESS Stage 2a**

Dear Mr Huthman,

I refer to your submission requesting approval of the Construction Environmental Management Plan for the Battery Energy Storage System (BESS) Stage 2a (Revision 1.2, 15 June 2022 submitted in accordance with Condition 1, Schedule 4 of SSD-8392). I also acknowledge your response to the Department's review comments and requests for additional information.

I note the Construction Environmental Management Plan has been:

- reviewed by Edify Energy and no issues have been raised with the Department; and
- contains the information required by the conditions of approval.

As nominee of the Planning Secretary, I approve the Construction Environmental Management Plan for the BESS Stage 2a (Revision 1.2, 15 June 2022) under Condition 1 of Schedule 4.

You are reminded that if there is any inconsistency between the approved document and the conditions of approval, then the requirements of the conditions of approval prevail.

Please ensure you make the approved plan and this approval letter publicly available on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Katie Weekes on (02) 4927 3223.

Yours sincerely

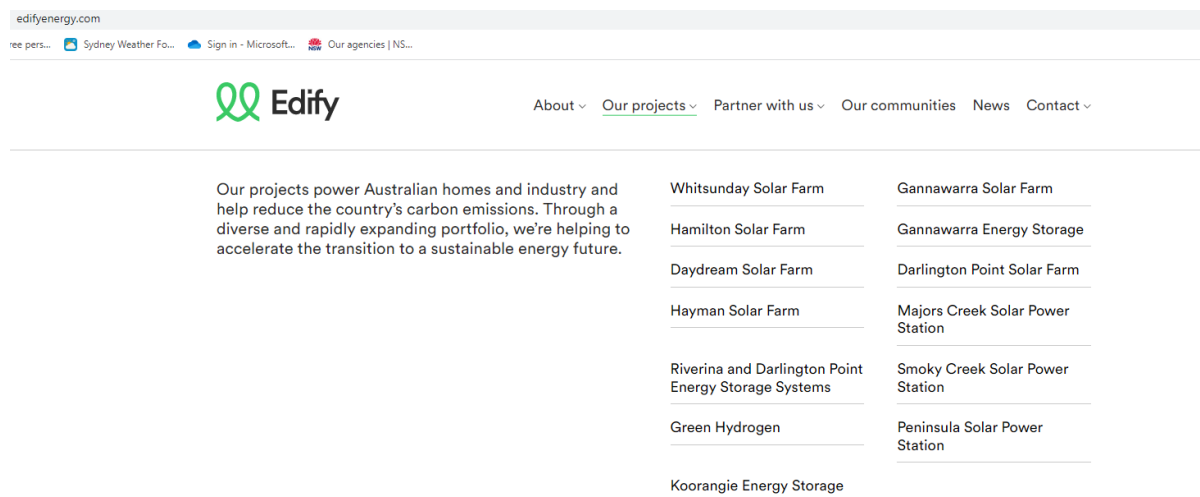
A blue ink signature, likely of Nicole Brewer, written over a horizontal line.

Nicole Brewer
Director
Energy Assessments
As nominee of the Planning Secretary

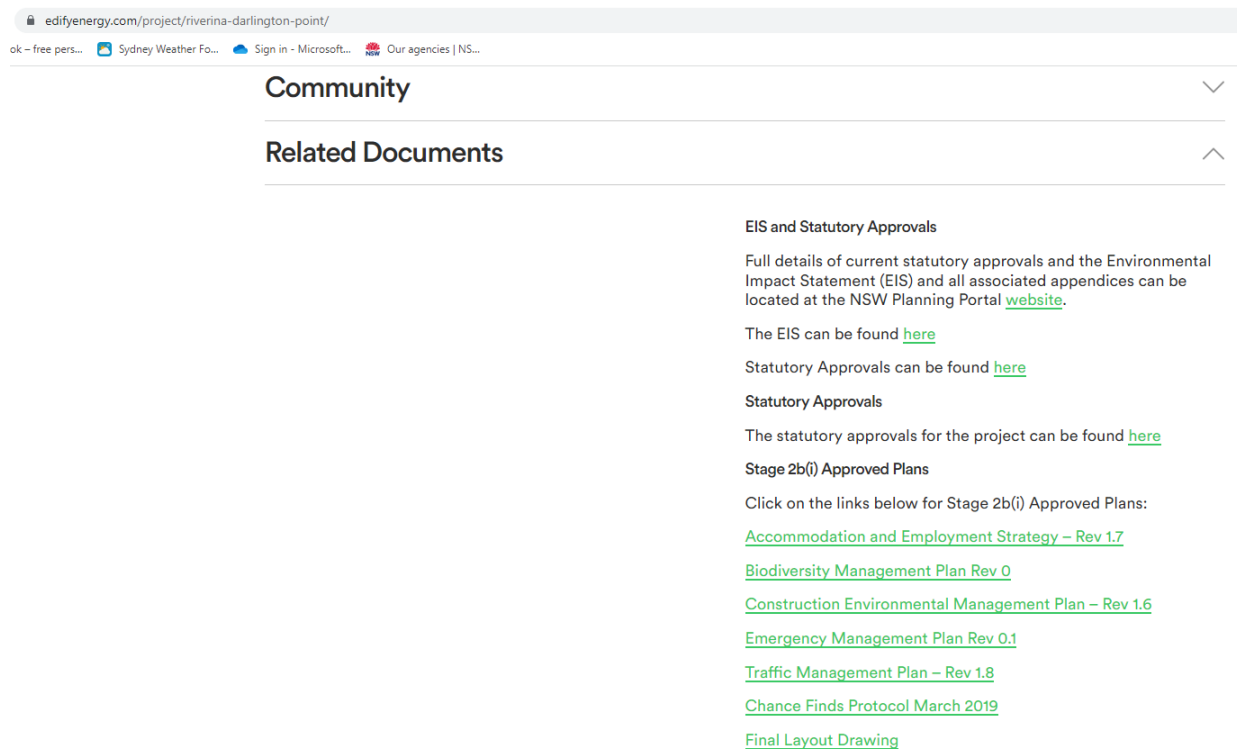
4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124

www.dpie.nsw.gov.au

1

Photo 24 – Approved plans uploaded on website

<https://edifyenergy.com/>



<https://edifyenergy.com/project/riverina-darlington-point/>

Appendix G

Evidence Collected

7.7 APPENDIX G1

APPENDIX D DEWATERING ASSESSMENT

Dewatering Assessment					
Project Name			Project No.		
Project Manager			Site Manager		
Person Completing			Date		
Area of Project					
What is anticipated to be the source of water?			<input type="checkbox"/> Infiltrated Groundwater		<input type="checkbox"/> Stormwater/Rainwater
Is there a requirement to assess existing groundwater quality?			<input type="checkbox"/> Yes		<input type="checkbox"/> No
What mechanisms will be used to dewater?	<input type="checkbox"/> Flexi Drive	<input type="checkbox"/> Submersible (Electric)	<input type="checkbox"/> Submersible (Hydraulic)		<input type="checkbox"/>
What dewatering controls are required (Identify the location of the controls on FRM-G001 ESCP)	<input type="checkbox"/> Sediment Basin	<input type="checkbox"/> Sediment Tank	<input type="checkbox"/> Turkey Nests	<input type="checkbox"/> Pumped and filtered through sediment fencing, silt traps or similar	<input type="checkbox"/> Pumped onto grassed area
Identify dewatering mechanisms for extreme/high rainfall situations?	<input type="checkbox"/> Sediment tanks	<input type="checkbox"/> Sediment Basins	<input type="checkbox"/> Vacuum Trucks	<input type="checkbox"/>	<input type="checkbox"/>
How will concrete washout be handled on this project? Identify the location of washout areas on the on FRM-G001 ESCP.			<input type="checkbox"/> Washed into sealed bin	<input type="checkbox"/> Washed into established wash down area	<input type="checkbox"/> No wash down will occur on site
If sediment basins and tanks are generally utilised to capture water, please complete the following section – (revisit this section during extreme/high rainfall situations if using sediment tanks and basins to dewater)					
Prior to dewatering determine monitoring and measuring requirements? (pH will be tested frequently and the pH range will be between 6.5-8.5)			<input type="checkbox"/> pH Strips	<input type="checkbox"/> pH Meter	<input type="checkbox"/> Turbidity Tube <input type="checkbox"/> Hydrocarbons
If the pH range is not between 6.5-8.5 the following is required.	<input type="checkbox"/> If the pH is above 8.5, hydrochloric acid is required to lower the pH.		<input type="checkbox"/> If the water pH is below 6.5, a base such as agricultural lime, with a pH of about 8.2, is required to raise the pH.		
If the TSS of stored water is above 50mg/L, flocculent should be used to make the sediment drop to the base of treatment tank/area. Identify this project's flocculent requirement from the following table. (Apply the flocculent as per the manufacturers recommendations)					
<input type="checkbox"/> Gypsum	<input type="checkbox"/> Liquid Alum	<input type="checkbox"/> Flocculent Blocks	<input type="checkbox"/> Not Applicable		

FRM-G012 June 2019 v1.0

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Construction Environmental Management Plan

Riverina Battery Energy Storage System (BESS) Stage

CPP Project No: 11291

Consolidated Power Projects
Dewatering Assessment (continued)

Considering the requirements outlined above, is it possible to reuse stormwater and groundwater for dust suppression?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

7.8 APPENDIX G2



Construction Environmental Management Plan

Riverina Battery Energy Storage System (BESS) Stage

CPP Project No: 11291

APPENDIX E WATER RELEASE ASSESSMENT

Water Release Assessment



Project Name		Project No.	
Project Manager		Site Manager	
Person Completing Form		Date	
Proposed Release Location		Approx. Volume	

[illegible]

7.9 APPENDIX H - Response to Audit Recommendations

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action Taken/Response (as applicable)	Proposed Action Due Date
Condition 15 of Schedule 3	The Applicant must minimise the dust generated by the development.	Observed extent of dust generation to be minimal. However, observed dust deposition in form of mud tracking on access roads caused by vehicle movements.	Recommend use of mechanical street sweeper as mud tracking becomes more frequent. Continue monitoring for mud tracking offsite and deploy suitable resources to avoid or minimise potential for sediment runoff.	<i>CPP has utilised a sweeper attachment on a skid steer on multiple occasions to remove any soil / mud from the sealed section of our site entry as required to ensure no excess mud is deposited on Donald Ross drive. This will be completed ongoing on a needs basis. Recently, dust has not been an issue due to the constant wet weather. A rumble grid is installed which all vehicles must exit over when leaving site to assist in removing any mud from wheels.</i>	4/11/2022
Condition 21 of Schedule 3	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Observed evaporation constructed for the storage of stormwater generated on site. During heavy rainfall, there is likelihood of water overflowing from the site due spillage. Concrete pours and use of a concrete washout bay was observed during the site inspection. The concrete washout pit is found to be inadequate for the containment of leftover concrete and spills.	To ensure compliance, it is recommended CPP develop procedures for the monitoring, testing, treatment and controlled discharge of water from the evaporation pond onsite. It is also recommended the concrete washout pit be designed to ensure spillage does not overflow and can be easily maintained.	<i>CPP will develop procedures for the monitoring, testing, treatment and controlled discharge of water from the evaporation pond on site. This will be included in a revision of the CEMP. The Bess has a dedicated concrete wash out pit. The bay has been constructed with high bund walls and secured black plastic. The pit is cleaned out before it reaches its capacity and re-lined with black plastic. The pit has been designed to accommodate a reversing Agi truck or boom pump.</i>	30/11/2022
Condition 25 of	Hazards > Storage and Handling of Dangerous Materials	SDS were maintained on the master register, but some	Recommend that the Site SDS register be maintained and kept up to	<i>CPP has 558 hazardous chemicals listed in a company master register that is available on site electronically. Each</i>	4/11/2022

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Schedule 3	<p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <p>(a) the requirements of all relevant Australian Standards; and</p> <p>(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids.</p> <p>In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	SDS were not filed on the site register.	<p>date to meet regulatory compliance set out in the EPA Handbook.</p> <p>Store and handle all chemicals, fuels and oils used on-site in accordance with the requirements of all relevant Australian Standards and the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook, May 2007 if the chemicals are liquids. Make sure SDS for all chemicals are up-to-date and accessible at any time.</p>	<p><i>individual hazardous chemical has an accessible accompanied SDS.</i></p> <p><i>The BESS project has identified 51 hazardous chemicals that are on site or are frequently used. Each hazardous chemical has an SDS that is readily assessable electronically and in the field in a hard copy folder. The folder is located within the project Haz chemical container. Any new chemicals identified during audits or inspections, are printed, and saved from the master register and into the site registers and folder.</i></p> <p><i>A complete review of the site register SDS register has been completed and currency of SDS's has been confirmed.</i></p> <p><i>A review of all substances on site has also been completed to ensure SDS's are available.</i></p>	
Condition 8 of Schedule 4	<p>Access To Information</p> <p>The Applicant must:</p> <p>(a) make the following information publicly available on</p>	It was noted that the Biodiversity Management Plan currently available on Edify's project website is not the identical version that	Recommend uploading the correct approved plans, especially the Biodiversity Management Plan along with the approval letter. Likewise, the Emergency Management Plan, along	<p><i>Either the documents that are currently on the project website have been updated since the auditor conducted the audit, or the finding is incorrect. The dot-pointed items are on the page (https://edifyenergy.com/project/riverina-darlington-point/) under the 'Related Documents' tab.</i></p>	4/11/2022

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	<p>its website as relevant to the stage of the development;</p> <p>the EIS;</p> <p>the final layout plan for the development;</p> <p>current statutory approvals for the development;</p> <p>approved strategies, plans or programs required under the conditions of this consent;</p> <p>the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;</p> <p>how complaints about the development can be made;</p> <p>a complaints register;</p> <p>compliance reports;</p> <p>any independent environmental audit, and the Applicant's response to the recommendations in any audit; and</p> <p>any other matter required by the Secretary; and</p>	<p>DPIE had approved earlier as noted in the approval letter dated 15 Jun 2022. The officially approved plan is Ver 8.0, dated 4 Jun 2019, which is called <i>Biodiversity Management Plan for Darlington Point Solar Farm - Stage 2a</i>. It is stated in the approval letter that the approved plan is to be placed on the project website at the earliest convenience.</p>	<p>with DPIE's approval letter would also need to be uploaded on Edify's website for stage 2b works.</p> <p>The Final Layout Plans are available on Edify's website, but not on DPIE's major project portal. Recommendation would be to correspond with DPIE to have the Final Layout Plans uploaded.</p> <p><u>Follow up comments</u></p> <p>Noted. It appears that the proponent has recently uploaded relevant documents including management plans on their company website. The proponent, being Edify Energy had completed stage 1 works for the development of solar farm through engaging Signal Energy. The proponent needs to ensure that not only the approved plans are uploaded, but also the approval letters issued by DPIE for Stage 2a works remain publicly available on the project website at the earliest convenience.</p>	<p><i>In any case, the website is currently compliant with the Condition. However, it will be updated in the coming days once we are notified that Stage 2b(i) has commenced.</i></p>	

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	(b) keep this information up to date.				