

# Environmental Management Strategy

WELLINGTON SOLAR FARM



APRIL 2020



## Document Verification



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## Plan Control

The latest version of this plan will be available on the electronic document management system for the Project for relevant Project personnel. The plan would also be available on the Project Website. Distribution of the plan will be to those detailed in the distribution listing below. This distribution will be electronic.

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# CONTENTS

<b>1</b>	<b>INTRODUCTION.....</b>	<b>4</b>
1.1	PURPOSE AND OBJECTIVES .....	4
1.2	THE PROPOSAL.....	5
1.3	ENVIRONMENTAL MANAGEMENT STRATEGIC FRAMEWORK .....	5
1.4	ENVIRONMENTAL POLICY .....	6
1.5	CONTINUAL IMPROVEMENT .....	6
<b>2</b>	<b>PLANNING .....</b>	<b>7</b>
2.1	LEGISLATIVE AND OTHER ENVIRONMENTAL MANAGEMENT REQUIREMENTS.....	7
2.2	ENVIRONMENTAL OBJECTIVES AND TARGETS.....	7
2.3	CONDITIONS OF CONSENT .....	8
<b>3</b>	<b>RISK MANAGEMENT .....</b>	<b>10</b>
3.1	IDENTIFICATION OF ENVIRONMENTAL HAZARDS AND RISKS.....	10
<b>4</b>	<b>IMPLEMENTATION AND OPERATION.....</b>	<b>11</b>
4.1	STRUCTURE AND RESPONSIBILITY .....	11
4.2	ENVIRONMENTAL PLANS .....	13
4.3	TRAINING, AWARENESS AND COMPETENCE .....	14
4.4	COMMUNICATION .....	16
4.5	ENVIRONMENTAL SITE INSPECTIONS AND IMPACT VERIFICATION .....	18
4.6	DOCUMENTATION AND DOCUMENT CONTROL.....	19
4.7	EMERGENCY PREPAREDNESS AND RESPONSE (INCIDENT REPORTING) .....	19
<b>5</b>	<b>MEASUREMENT AND EVALUATION .....</b>	<b>21</b>
5.1	SYSTEM AUDITING AND MAINTENANCE.....	21
5.2	ENVIRONMENTAL MONITORING AND REPORTING .....	22
5.3	NON-COMPLIANCE AND CORRECTIVE AND PREVENTATIVE ACTION .....	26
<b>6</b>	<b>MANAGEMENT REVIEW.....</b>	<b>27</b>
<b>APPENDIX A</b>	<b>ENVIRONMENTAL POLICY</b>	<b>28</b>
<b>APPENDIX B</b>	<b>ENVIRONMENTAL LEGISLATION</b>	<b>31</b>
<b>APPENDIX C</b>	<b>ENVIRONMENTAL INCIDENT RESPONSE PROCEDURE</b>	<b>41</b>
<b>APPENDIX D</b>	<b>SPILL RESPONSE PLAN</b>	<b>44</b>
<b>APPENDIX E</b>	<b>EMS CONSULTATION SUMMARY</b>	<b>46</b>
<b>APPENDIX F</b>	<b>AGENCY APPROVAL OF EMS</b>	<b>49</b>

## TABLES

Table 2-1 Environmental objectives and targets ..... 7

Table 2-2 Condition 1 of Schedule 4 of the CoC, and where it is addressed in the EMS..... 9

Table 4-1 Construction team roles and responsibilities ..... 12

Table 4-2 Construction sub-plans and approval requirements ..... 13

Table 5-1 Monitoring and reporting as required under the CoC and SoC in relation to the Project..... 23

## ACRONYMS AND ABBREVIATIONS

CoC	Conditions of Consent
CEMP	Construction Environmental Management Plan
DP&E	(NSW) Department of Planning and Environment
EEC	Endangered ecological community
EMS	Environmental Management Strategy
EIS	Environmental Impact Statement
EPA	Environment Protection Authority (Previously DECCW and/or OEH)
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cwth)
ERSED	Erosion and Sediment
EWMS	Environmental Work Methods Statement
ESCP	Erosion and Sediment Control
FM Act	Fisheries Management Act 1994 (NSW)
HMP	Heritage Management Plan
HSEQ	Health Safety and Environment and Quality
NSW	New South Wales
MP	Management Plan
SWQMP	Soil and Water Management Plan
SoC	Statement of Commitment
The Proponent	Lightsource BP
The Project	Wellington Solar Farm
TMP	Traffic Management Plan

# 1 INTRODUCTION

## 1.1 PURPOSE AND OBJECTIVES

Planning approval was received on 25 May 2018 for the construction and operation of a 174 megawatt (MW AC) photovoltaic (pv) solar farm with an energy storage facility, located 2 km north-east of Wellington within the Dubbo Local Government Area (LGA). The Wellington Solar Farm ('the Project') is a State Significant Development and represents an important contribution to renewable energy generation in New South Wales.

On December 11, 2019, a Modification Application (NGH 2019) was approved by the Department of Planning, Industry and Environment (DPIE) to expand the existing substation on Goolma Road and change the transmission connection to it. This was required to facilitate connection of the project to the substation.

On 3 April 2020, the second Modification Application (NGH 2019) was approved by DPIE to modify the solar panel layout, electrical and transmission connection routes, expand the battery storage facility and add an additional operations and maintenance building. In addition, the second Modification Application confirmed panel technology and the site access point relocation.

This Environmental Management Strategy (EMS) has been prepared to comply with the Conditions of Consent (CoC) from the New South Wales Minister for Planning and all applicable legislation, during the construction of the Project.

The EMS has been prepared using the Guideline for the Preparation of Environmental Management Plans (DIRNP, 2004), the Draft Post Approval Guideline for Environmental Management Plans (DPE 2018) and AS/NZS ISO 14001 as a guide in its preparation. This EMS has been prepared only for the construction component of the Project and will be updated to incorporate the operational aspects of the proposal following construction.

The purpose of this EMS is to provide a framework for the management of environmental issues during construction of the Project. Implementing this EMS will ensure that the Project team meets the Project CoC, regulatory and policy requirements in a systematic manner and continually improves its performance.

In particular, this EMS:

- Provides the strategic framework for environmental management of the Project.
- Provides general mechanisms for compliance with applicable policies, approvals, licences, permits, consultation agreements and legislation.
- Describes the environmental management related roles and responsibilities of all key personnel involved.
- Sets objectives and targets for issues that are important to the environmental performance of the Project.
- Outlines a monitoring regime to check the adequacy of controls as they are implemented during construction.

This EMS is the overarching document in the environmental management system for the Project that includes a number of management documents. These are described in Section 4.2. The EMS is applicable to all staff and sub-contractors associated with the construction of the Project.

## **1.2 THE PROPOSAL**

The Scope of Works under the contract includes all works necessary to design, construct, test, commission, energise, decommission, and train staff in the operation of a 174 MW AC solar farm including energy storage (approximately 25 MW / 100 MW rated capacity), and inverter stations.

The Scope of Works consists of but is not limited to:

- Approximately 500,714 solar panels (up to 4.5 metres (m) in height) and approximately 33 inverter stations (up to 2.9 m in height).
- An energy storage facility (approximately 25 MW / 100 MW rated capacity) with up to 6 purpose-built blocks (which will be constructed at a later date outside the main construction period).
- Underground 33kV, 132 kV or 330 kilovolt (kV) transmission cables connecting the energy storage facility to the TransGrid substation.
- Internal access tracks, staff amenities, car parking, laydown area and security fencing.
- The substation expansion includes underground transmission cables and an additional substation bench (located on the western edge of the existing substation).
- The number of panels has increased from the estimated 440,000 in the EIS to 500,714.
- The number of inverter stations has decreased from 50 to 33.

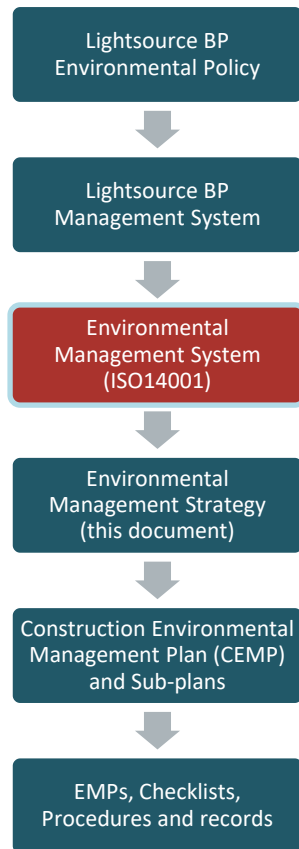
During construction, the Site will be accessed off Goolma Road, approximately 4.6 km north of the intersection with the Mitchell Highway. Key road works for the Project will involve upgrading the intersection of Goolma Road and the Site access point with a Basic Right Turn (BAR) and Basic Left Turn (BAL) treatment.

The construction period of the solar farm will last for up to 12 months from the commencement of Site establishment works and include a peak period of 6 months. Construction hours will be limited to Monday to Friday 7 am to 6 pm, and Saturday 8 am to 1pm.

The estimated Capital Investment Value of the Project is \$270 million.

## **1.3 ENVIRONMENTAL MANAGEMENT STRATEGIC FRAMEWORK**

Below is a flow chart outlining the overall strategic framework for environmental management in delivering Lightsource BP's scope for construction of the of works for the Wellington Solar Farm.



## 1.4 ENVIRONMENTAL POLICY

The environmental policy describes Lightsource BP’s commitment to manage its activities in such a way that reduces their environmental impact to a practical minimum.

The environmental policy is displayed at the site office and communicated to employees and other interested parties via inductions and ongoing awareness programs.

A copy of the environmental policy is provided in Appendix A.

## 1.5 CONTINUAL IMPROVEMENT

Management reviews are undertaken as part of the continual improvement process. The review process will be detailed in the Construction Environmental Management Plan (CEMP).

Communication is also key for continual improvement as discussed in Section 4.4. with environmental management documents also going through the continual improvement process.

## 2 PLANNING

### 2.1 LEGISLATIVE AND OTHER ENVIRONMENTAL MANAGEMENT REQUIREMENTS

A register of legal and other requirements for the Project is contained in Appendix A. This register is maintained as a checklist. This register will be reviewed at regular intervals e.g. during management reviews and updated with any applicable changes. Any changes made to the legal requirements register will be communicated to the wider team where necessary through toolbox talks, specific training and other methods detailed in Section 4.3.

### 2.2 ENVIRONMENTAL OBJECTIVES AND TARGETS

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

The targets are incorporated into relevant environmental management plans.

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

Environmental objectives and targets for the Project are provided in Table 2-1 below.

Table 2-1 Environmental objectives and targets

Objective	Target	Measurement Tool
Construction of the Project in accordance with environmental approvals and relevant licences.	Compliance with statutory approvals	Audits, construction compliance reporting, management review
Construction of the Project in accordance with approved environmental management plans	Compliance with EMS and Project management plans Compliance with relevant environmental procedures	Audits, construction compliance reporting, management review
Compliance with all legal requirements	No regulatory infringements (PINs or prosecutions) No formal regulatory warning	Audits, construction compliance reporting, management review
Implement rigorous and comprehensive EMS that meets the requirements of AS/NZS ISO 14001	Address non-conformances and corrective actions within specific timeframes	Audits, management review
Engage with the affected and broader community, minimise complaints and respond to any complaints within a suitable timeframe	Disseminate regular Project updates and other information through the Project website and other tools identified by the Community Consultation Plan (CCP). Record and respond to complaints within the timeframe specified in the CCP	Review complaints register, construction compliance report, audits

Objective	Target	Measurement Tool
Continuously improve environmental performance	Develop and implement a program of ongoing environmental training Capture lessons learnt from environmental incidents to minimise repeat issues Encourage and reward innovation and effort throughout the workforce.	Construction compliance report, management review, audits

## 2.3 CONDITIONS OF CONSENT

Preparation of an EMS prior to the commencement of construction is a requirement of CoC Condition 1 of Schedule 4.

*Prior to the commencement of construction, the applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary.*

- (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:*
  - 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:*
  - copies of 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.*

*Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.*

DPE issued consent for the Project on the 25 May 2018. Each of the requirements of Condition 1 of Schedule 4, and where they are addressed are detailed in Table 2-2 below.

Table 2-2 Condition 1 of Schedule 4 of the CoC, and where it is addressed in the EMS.

Condition	Relevant Section of EMS
(a) provide the strategic framework for environmental management of the development	Section 1.3, Environmental Management Strategic Framework
(b) Identify the statutory approvals that apply to the development	Appendix A B, Environmental Legislation
(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development	Section 4.1, Structure and Responsibility
(d) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise;</li> <li>• respond to any non-compliance;</li> <li>• respond to emergencies;</li> </ul>	Section 4.4 Internal and external communication. Section 4.4.3 Stakeholder and community consultation Non-compliance issues – Section 5.1 System monitoring and maintenance Emergency response – Sections 4.7 and 5.3
(e) include <ul style="list-style-type: none"> <li>• copies of any plans approved under the conditions of this consent; and</li> <li>• a clear plan depicting all the monitoring to be carried out in relation to the development. Following the Secretary’s approval, the Applicant must implement the Environmental Management Strategy.</li> </ul>	The EMS is the overarching document that includes framework for the management of environmental issues during construction. Environmental plans prepared as part of this strategy are detailed in Section 4.2. A plan depicting all the monitoring to be carried out in relation to the Project, and a table summarising all the monitoring and reporting obligations is included in Section 5.2

## **3 RISK MANAGEMENT**

### **3.1 IDENTIFICATION OF ENVIRONMENTAL HAZARDS AND RISKS**

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

Risks assessment are undertaken at various stages of construction and documented in management plans, work method statements and other Project documents. The objectives of these risk assessments are to:

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

Risk assessments for the Project are based on AS/NZS 4360:1999, the Australian standard for risk assessments.

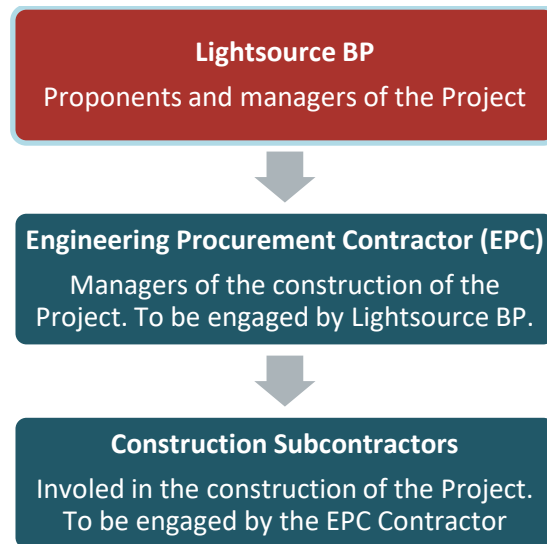
The following actions will be undertaken to meet the objectives of the risk assessments associated with the Project:

- Hold a construction risk assessment workshop prior to construction.
- Review outcomes of risk assessments of the workshop quarterly.
- Review outcomes of risk assessment for major work stages of construction.

## 4 IMPLEMENTATION AND OPERATION

### 4.1 STRUCTURE AND RESPONSIBILITY

Below is a flow chart outlining the overall hierarchy of teams responsible for the construction of the Project.



Roles and responsibilities of Lightsource BP's Project construction team are identified and described in Table 4-1.

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

#### 4.1.1 Lightsource BP Organisational Chart

Lightsource BP's organisational chart is provided below in Figure 4-1.

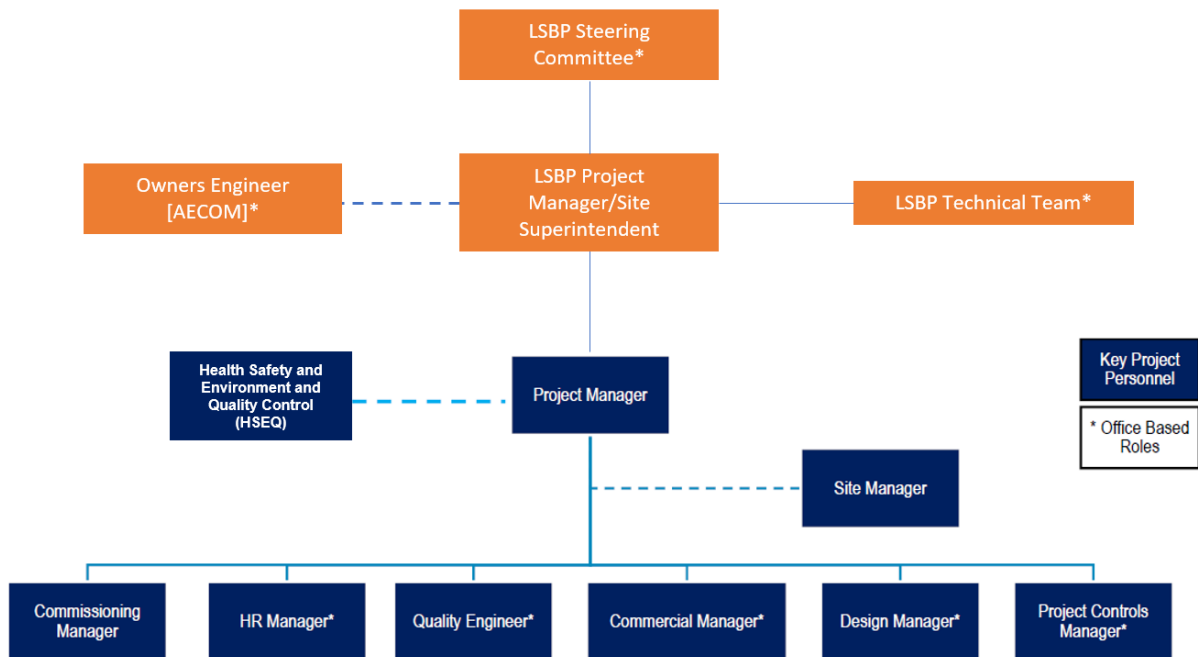


Figure 4-1 Lightsource BP company organisational chart

#### 4.1.2 Environmental Management Team

Table 4-1 Construction team roles and responsibilities

Role	Responsibility	Authority
<b>EPC Project Manager</b>	<ul style="list-style-type: none"> <li>Ensure resources are made available to enable works to comply with EMS and other environmental management requirements.</li> <li>Ensure that all procedures are followed adequately.</li> <li>Ensure appropriate approvals and licences are held.</li> <li>Ensure all staff and contractors are aware of environmental compliance requirements and environmental controls.</li> <li>Responsible for reporting incidents and non-compliance with the conditions of consent</li> </ul>	<ul style="list-style-type: none"> <li>Order Stop-work for an activity that may cause material or environmental harm.</li> <li>Release of environmental hold points, if required.</li> </ul>
<b>EPC Health Safety and Environment and Quality Manager (HSEQ)</b>	<ul style="list-style-type: none"> <li>Maintaining all environmental management documents.</li> <li>Identifying where environmental measures are not meeting the targets and where improvements can be achieved.</li> <li>Monitoring and reporting environmental compliance.</li> </ul>	<ul style="list-style-type: none"> <li>Recommend Stop-work for an activity that may cause material or environmental harm.</li> <li>Release of environmental hold points, if required.</li> </ul>

Role	Responsibility	Authority
	<ul style="list-style-type: none"> <li>Reviewing Project environmental documents.</li> <li>Reporting of pollution incidents.</li> </ul>	
<b>EPC Site Manager</b>	<ul style="list-style-type: none"> <li>Responsible for the implementation of environmental management plans.</li> <li>Responsible for the induction of staff and contractors.</li> <li>Responsible for all aspects of the worksite including the coordination and management of all staff and subcontractors.</li> <li>Undertake routine environmental site inspection.</li> <li>Maintaining environmental records.</li> <li>Receiving plant, materials and chemicals and ensuring all items are appropriately stored.</li> <li>Responsible for addressing corrective actions arising from Environmental Inspections.</li> </ul>	<ul style="list-style-type: none"> <li>Order Stop-work if any items in the CEMP are in danger of breach.</li> <li>Approve and accept waste disposal methods requested by staff or subcontractors.</li> <li>Approve minor changes to environmental sub-plans, including Erosion and Sediment Control Plans (ESCP).</li> </ul>
<b>All Lightsource BP staff:</b> <ul style="list-style-type: none"> <li><b>LSBP Project Manager/Site Superintendent</b></li> <li><b>LSBP Steering Committee</b></li> <li><b>LSBP Technical Team</b></li> </ul>	<ul style="list-style-type: none"> <li>Ensure contractors are working in accordance with the requirements of the EMS, as required under the EPC contract.</li> <li>Undertake site visits during construction to monitor compliance with EMS requirements.</li> <li>Report and raise any issues that arise that may have an environmental impact.</li> <li>Report and raise the discovery of any artefacts, Aboriginal relics or places and cease work until the matter has been addressed.</li> </ul>	<ul style="list-style-type: none"> <li>Report any issues that may have the potential to cause material or environmental harm.</li> <li>Report any incidents or near-misses that may impact on the environment or breach conditions set-out in this EMS.</li> </ul>
<b>Subcontractors</b>	<ul style="list-style-type: none"> <li>Operate as instructed by the EPC Site Manager in compliance with all environmental requirements.</li> </ul>	<ul style="list-style-type: none"> <li>EPC Site Manager</li> </ul>

## 4.2 ENVIRONMENTAL PLANS

A CEMP will be prepared to guide the delivery of environmental management on the project. The CEMP will be supported by a series of sub-plans, Environmental Work Method Statements (EWMS), Erosion and Sediment Control Plans and other documents.

A list of construction sub-plans and strategies for the Project are provided in Table 4-2.

Table 4-2 Construction sub-plans and approval requirements

Document name	Document identifier	Approval requirement
Traffic Management Plan	TMP	Prepare in consultation with RMS and Council, and to the satisfaction of the Secretary

Document name	Document identifier	Approval requirement
Landscape Plan	LP	Prepare in consultation with RMS and Council, and to the satisfaction of the Secretary
Biodiversity Management Plan	BMP	Prepare in consultation with OEH and to the satisfaction of the Secretary
Heritage Management Plan	HMP	Prepare in consultation with OEH and Aboriginal Stakeholders, and to the satisfaction of the Secretary
Stormwater Plan	SP	Internal Lightsource BP approval, as part of SWMP
Fire Safety Study	FSS	Fire and Rescue NSW and to the satisfaction of the Secretary
Fire Management and Emergency Response Plan	FMERP	Fire and Rescue NSW, NSW Rural Fire Service and to the satisfaction of the Secretary
Heritage Salvage Plan	HSP (as part of the HMP)	Internal Lightsource BP approval
Waste Management Plan	WMP	Internal Lightsource BP approval
Groundcover Management Plan	GMP	Internal Lightsource BP approval
Rehabilitation Plan	RP	Internal Lightsource BP approval
Haulage Plan	HP (as part of the TMP)	Internal Lightsource BP approval
Road Dilapidation Report	RDR	Internal Lightsource BP approval
Community Consultation Plan	CCP	Internal Lightsource BP approval

## 4.3 TRAINING, AWARENESS AND COMPETENCE

To ensure that this EMS is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this strategy. The HSEQ will coordinate the environmental training in conjunction with other training and development activities (e.g. safety).

### 4.3.1 Environmental induction

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

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

The HSEQ will conduct the environmental component of the site inductions.

The environmental induction will address a range of issues including, but not limited to:

- Purpose and objectives of EMS.
- Requirements of due diligence and duty of care.
- Roles and responsibilities.
- Typical project environmental hazards and risks, including:
  - No go and exclusion zones
  - Location of sensitive environmental areas
  - Community sensitivities

- Environmental emergency and incident procedures and locations of emergency spill kits.
- Management and reporting process for environmental incidents.

A record of all environment inductions will be maintained and kept on-site.

The HSEQ will review and approve the induction program and monitor implementation.

#### **4.3.2 *Toolbox talks, training and awareness***

Toolbox talks will be one method used to raise awareness and educate personnel on issues related to environmental risks. Discussion of environmental issues will be a standard agenda item on all toolbox talks. From time to time, specific topics will be selected for more detailed discussion. Toolbox talks will be prepared and delivered by the Site Manager. A register of toolbox talks will be kept on site and maintained by the HSEQ.

Typical environmental topics discussed at toolbox talks include:

- Vegetation clearing and protection.
- Erosion and sedimentation management.
- Noise, vibration, and air quality management.
- Management of identified heritage items.
- Emergency procedures.

#### **4.3.3 *Environmental Awareness Training***

In addition to inductions and toolbox talks, select employees and sub-contractors may be provided with additional environmental awareness training. Formal qualifications for specialist staff may be required in relation to activities such as animal handling and the design of erosion and sedimentation control plans.

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

This training may be delivered by external providers or by the HSEQ Manager. Daily pre-start meetings will occur during construction. The pre-start meeting is a tool for informing the workforce of the day's activities. Safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination with other trades, hazards and other information that may be relevant to the day's work are discussed.

The Site Manager will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Daily pre-start meetings are generally succinct and take approximately 10-15 minutes.

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

## 4.4 COMMUNICATION

### 4.4.1 Internal communication

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

#### Daily onsite communication

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

#### Fortnightly environmental inspections

Fortnightly environmental inspections will be undertaken with the HSEQ and relevant Project staff. The purpose of these inspections is to communicate ongoing environmental performance and to identify any issues to be addressed.

#### Monthly project review meetings

Monthly Project review meetings will be attended by Lightsource BP, the EPC contractor and any other significant parties. The meetings will discuss the progress of the Project and will review significant environmental risks.

#### Management review

A Management Review of the EMS and Project plans will be completed at least once during the Project. This will involve the HSEQ Manager and relevant Project team members and stakeholders.

A requirement of Schedule 4 (2) of the CoC states that;

*The Applicant must:*

- (a) update the strategies and plans required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and*
- (b) review and, if necessary, revise the strategies and plans required under this consent to the satisfaction of the Secretary within 1 month of the:*
  - *submission of an incident report under condition 3; or*
  - *any modification to the conditions of consent.*

Amendments to the Project's management documents, risk assessment review, re-evaluation of the Project objectives and targets as well as changes to other Project documents would be conducted in accordance with the Documentation and Document Control procedures outlined in Section 4.6.

### 4.4.2 Government Authority communication

The HSEQ will be the main point of contact regarding specific environmental issues. The HSEQ has the responsibility to provide, upon request, information on the ongoing environmental performance of the Project to DPE. Lightsource BP will also notify the Department prior to the commencement of construction, operations, upgrading and decommissioning of the development.

Details of incident reporting to government agencies, including DPE, are provided in Section 4.7.

The name and contact numbers for the site personnel who are available to EPA on a 24-hour basis and who have the authority to take immediate action to shut down any activity or to affect any pollution control measure as directed by an authorised officer of EPA will be provided. These roles are:

1. Project Manager/Site Superintendent (Lightsource BP)
2. Project Manager (EPC)
3. HSEQ Manager (EPC)

Schedule 4, Condition 3 of the CoC states that:

*The Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) 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.*

Lightsource BP will immediately notify the Secretary and any other relevant agencies of any incident on site. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. Within 7 days of the date of the incident, Lightsource BP will provide the Secretary and any relevant agencies with a copy of the incident report, and such further reports as may be requested.

In the event of non-compliance with the CoC, Lightsource BP will comply with Schedule 4 Condition 4 of the CoC, which states that:

*The Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the noncompliance (if known) and what actions have been done, or will be, undertaken to address the noncompliance.*

Additionally, Lightsource BP will ensure that results of the Independent Environmental Audit are submitted to the Secretary within 3 months of commencement of the audit. Refer to Section 5.1 for details about Project audit requirements.

#### **4.4.3 Stakeholder and community consultation**

Lightsource BP is aware of the necessity for an effective and genuine consultation process, in which the community and stakeholders are actively engaged.

Full details of future community consultation will be contained in the Project's CCP. These types of communication may include, but are not limited to:

- Regular Project updates
- Maintenance of 24-hour line of contact, and notifying all residence within 3 km of the details
- Establishment of a single point of contact for the community via a Lightsource BP phone number.
- Maintenance of the Project website, including publishing up-to-date information on the Project, such as:
  - The EIS.
  - The final layout plans for the development.
  - Current statutory approvals for the development.

- 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.
- Any other matter required by the Secretary (DPE).

#### **4.4.4 Complaints procedure**

Lightsource BP have established channels for receiving community feedback on the Project. In addition to direct contact from the public these channels will include:

- A postal address
- A website where complaints can be registered
- Direct complaint at the site office reception

A complaints procedure has been developed to identify and respond to issues generating complaints from the public. The complaints management and mediation system (unresolved complaints), has been prepared in accordance with *AS 4269: Complaints Handling*. The system includes a Complaints Register to record and compile information on all complaints received. The register includes details of the complainant, how the complaint was addressed, and whether resolution was reached, with or without mediation.

Complaints will be acknowledged by Project staff with a phone call within 24 hours of being received. Project staff will provide written acknowledgement within 48 hours of the complaint being received. Acknowledgement will include a resolution of the complaint where possible. Where a more detailed investigation is required Lightsource BP will provide a response and potential resolution within five working days of the complaint receipt. Unresolved complaints will follow mediation with an independent arbiter agreed by both parties.

The EPC will provide an environmental incident response procedure. Appendix C provides an example.

## **4.5 ENVIRONMENTAL SITE INSPECTIONS AND IMPACT VERIFICATION**

The HSEQ will be responsible for ensuring environmental site inspections are carried out. Environmental inspections will be conducted fortnightly and post rainfall during construction and will be recorded on relevant checklists.

At completion of inspections, the HSEQ will prepare the following:

- A site inspection report.
- A site inspection action plan listing deficiencies and corrective actions required.
- Sub-contractor notices for major/serious deficiencies.

All actions will be recorded and checked for implementation.

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

Prior to the commencement of works on each shift, an inspection will be carried out and will include a check of the relevant environmental controls and resources required to ensure effective operation and maintenance. Works are not to commence unless inspections are found to be satisfactory.

## 4.6 DOCUMENTATION AND DOCUMENT CONTROL

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

- All monitoring, inspection and compliance reports/records.
- Correspondence with public authorities.
- Induction and training records.
- Reports on environmental incidents, other environmental incidents non-conformances, complaints and follow-up action.
- Community engagement information, and a complaints record.
- Minutes of EMS and construction environmental management system review meetings and evidence of any action taken.

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

Only the HSEQ, or delegate, with relevant Agency approval (if required) has the authority to change any of the environmental management documentation.

### 4.6.1 Document control

Lightsource BP will coordinate the preparation, review and distribution, as appropriate, of the environmental documents listed in Section 4.2. During the Project, the environmental documents will be stored at the main site compound.

Lightsource BP will implement a document control procedure to control the flow of documents within and between stakeholders and sub-contractors.

The procedure will also ensure that documentation is:

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

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

## 4.7 EMERGENCY PREPAREDNESS AND RESPONSE (INCIDENT REPORTING)

The Fire Management and Emergency Response Plan (FMERP) identifies emergency procedures and incident response plans, including notification procedures. The Spills Response Plan (Appendix D) identifies measures that will be taken in the event of a spill onsite.

### 4.7.1 Incident Reporting

Typically, environmental incidents will be notified verbally to the Site Manager immediately. Lightsource BP would be notified in writing within 1 hour of any incident occurring. Incident reports will then be provided within 48 hours of the incident occurring, including lessons learnt from each environmental incident occurring, and proposed measures to prevent the occurrence of a similar incident.

#### 4.7.2 DPE Notifiable Incidents

As per Schedule 4 Condition 3 of the CoC, Lightsource BP will immediately notify the Secretary and any other relevant agencies of any incident on site. 'Immediately' has its ordinary dictionary meaning of promptly and without delay. Within 7 days of the date of the incident, Lightsource BP will provide the Secretary and any relevant agencies with a copy of the incident report, and such further reports as may be requested.

After the submission of an incident report, Lightsource BP will review and, if necessary, revise the strategies and plans required under the approval consent to the satisfaction of the secretary within 1 month of the submission of an incident report.

#### 4.7.3 EPA Notifiable Incidents

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

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

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

- NSW EPA as the appropriate regulatory authority (ARA) on **131 555 (or (02) 9995 5555**
- The NSW Ministry of Health **02 9391 9000**
- Safe Work NSW (formerly WorkCover) on **13 10 50**
- The local authority, Warren Shire Council on **02 6847 6600** (day time hours) or **02 6847 6600** (after hours)
- Fire and Rescue NSW on **000** or for Mobiles Only **112**
- Rural Fire Service North West Region on **02 6822 4422**

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

Lightsource BP will maintain all records relating to environmental incidents.

## 5 MEASUREMENT AND EVALUATION

### 5.1 SYSTEM AUDITING AND MAINTENANCE

#### 5.1.1 Internal Auditing

Environmental compliance audits by Lightsource BP may be conducted on all relevant aspects of the EMS and will be performed in accordance with recognised audit procedures. At least one internal compliance audit will be conducted during the Project.

Internal audits will verify that the Project is in compliance with conditions and that environmental control measures are effective. More frequent auditing may occur if environmental checks indicate major deficiencies with environmental management of the site.

Audits will be planned, carried out and reported to provide assessment of the Project. Audits will:

- Assess the environmental performance of the Project and assess whether it is complying with the requirements within the Project Approval and any other approvals or permits.
- Review the adequacy of any approved strategy, plan or program.
- Recommend measures or actions to improve the environmental performance of the Project; and or any strategy, plan or program required under the approvals.
- Assess the level of compliance with conditions, regulations (including license and permit conditions) and planned environmental management requirements.
- Assess the capacity to comply, inspect, test, monitor, control and verify that construction (by Lightsource BP, the EPC and any sub-contractors) activities are being carried in accordance with the Project's requirements and conditions

#### 5.1.2 External Auditing

An independent external audit is to be carried out within 6 months of the commencement of construction, or as directed by the Secretary.

Schedule 4, condition 5 of the CoC stipulates:

*Within 6 months of the commencement of construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the development. The audit must:*

- a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) be carried out in consultation with the relevant agencies;*
- c) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and*
- d) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent*

*Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations*

*contained in the audit report, and a timetable for the implementation of the recommendations.*

*The recommendations must be implemented to the satisfaction of the Secretary*

## **5.2 ENVIRONMENTAL MONITORING AND REPORTING**

CoC Condition 1 of Schedule 4 requires that the Environmental Management strategy must:

*e) include:*

- a clear plan depicting all the monitoring to be carried out in relation to the development.*

A plan depicting all the monitoring and reporting obligations to be carried out in relation to the Project is provided below (Table 5-1), along with the monitoring and reporting obligations identified in both the CoC and Statement of Commitments (SoC's), along with how these obligations will be met within the EMS

The objective of the monitoring and reporting will be to validate the impacts predicted for the Project, to measure the effectiveness of environmental controls and implementation of this EMS, and to address specific requirements.

Lightsource BP will respond in a timely manner to any requests in relation to monitoring or effectiveness of environmental controls and their implementation raised by NSW Government Agencies.

Table 5-1 Monitoring and reporting as required under the CoC and SoC in relation to the Project.

Item	CoC/SoC	Monitoring and Reporting Requirements	Monitoring proposed
<b>Project Conditions of Consent</b>			
Sch 3 C 1	<i>Heavy Vehicle Restrictions</i>	<p>The Applicant must ensure that the development does not generate more than:</p> <p>100 heavy vehicle movements a day during construction, upgrading or decommissioning.</p> <p>5 heavy vehicle movements a day during operations.</p> <p>The Applicant must ensure that the length of any heavy vehicle does not exceed 25 m.</p> <p>The Applicant must keep accurate records of the number of heavy vehicles entering or leaving the site each day.</p>	<p>Internal and External audits (TMP Section 8.4; EMS Section 5.1)</p> <p>Vehicle Movements Report made publicly available within three months of completion of construction. (TMP Section 8.5)</p> <p>Delivery Vehicle Register (TMP Appendix F)</p>
Sch 3 C 19	<i>Heritage Management Plan</i>	<p>The Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the Project.</p>	<p>Periodic inspection of Wellington South Scarred Tree 1 (HMP Section 5.4.1)</p> <p>Location of the reburied stone artefacts from the collections (HMP Section 5.4.1)</p> <p>Heritage Salvage Plan (HMP Section 5.4.1)</p> <p>Additional archaeological surveys in any area that is proposed for development that has not been previously surveyed (HMP Section 5.4.1)</p> <p>Auditing (HMP Section 5.4)</p>
Sch 3 C 20	<i>Water Pollution</i>	<p>The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the <i>Protection of the Environment Operations Act 1997</i>.</p>	<p>Erosion and Sediment Control Plans (CEMP)</p> <p>Regular monitoring and inspections (SWMP 7.3)</p> <p>Water quality parameters (SWMP Section 7.4, SWMP Appendix C)</p> <p>Weather monitoring (SWMP 7.5)</p> <p>Flood Plan (TMP Section 6.5)</p>
Sch 3 C 23	<i>Fire Safety Study</i>	<p>The study must report on the implementation status of the mitigation measures, listed in the EIS.</p>	<p>Fire Safety Study</p> <p>Fire Reports (FMERP)</p>

Item	CoC/SoC	Monitoring and Reporting Requirements	Monitoring proposed
<b>Statement of Commitments</b>			
RTS, Appendix A	Aboriginal Heritage	If the complete avoidance of PAD1 and PAD2 is not possible, further archaeological investigation in the form of test excavations in order to establish the nature and significance of any sub surface deposits should be undertaken. Alternatively, if PAD 1 and PAD 2 impacts are significantly reduced, monitoring certain areas for archaeological material during construction, could be undertaken. Excavations would be conducted prior to any development and would be undertaken in consultation with the Registered Aboriginal Parties in compliance with the OEH Code of Practice. A technical report on the results of the testing would be provided and management strategies recommended depending on the outcome. The testing would be conducted by a qualified archaeologist and members of the registered Aboriginal parties. Any monitoring or testing would be undertaken in consideration of OEH advice and outlined through a Cultural Heritage Management Plan.	Subsurface testing (HMP Section 5.4.1)
RTS, Appendix A	Traffic, transport and road safety	A Traffic Management Plan will be developed as part of the CEMP and DEMP, in consultation with the Dubbo Regional Council and Roads and Maritime. The plan will include: Procedures to monitor traffic impacts and adapt controls (where required) to reduce the impacts.	Inspection and maintenance program for local road access (TMP Section 8.3) Road Dilapidation Reports (TMP Section 8.5) Delivery Vehicle Register (TMP Appendix E)
RTS, Appendix A	Soils	Develop, implement and monitor a Soil and Water Management Plan (SWMP) (with erosion and sediment control plans) as part of the CEMP in accordance with Landcom (2004), to minimise soil and water impacts. These plans will include provisions to: Install, monitor and maintain erosion controls. Manage topsoil: In all excavation activities, separate subsoils and topsoils and ensure that they are replaced in their natural configuration to assist revegetation. Stockpile topsoil appropriately to minimise weed infestation, maintain soil organic matter, maintain soil structure and microbial activity.	Erosion and Sediment Control Plans (CEMP) Erosion controls (SWMP Section 6). Monitoring of sediment fences (SWMP Section 7.3) Monitoring of rehabilitated areas (SWMP Section 7.3) Monitoring of waste bins (SWMP Section 7.3) Monitoring underneath solar arrays for tunnel erosion (SWMP Section 7.3) Revegetation procedures (BMP Section 6.1)

Item	CoC/SoC	Monitoring and Reporting Requirements	Monitoring proposed
			Groundcover Management Plan (BMP Appendix A)
RTS, Appendix A	Soils	<p>Develop a Spill and Contamination Response Plan as part of the overall Emergency Response Plan to prevent contaminants affecting adjacent surrounding environments. The plan will include measures to:</p> <p>Respond to the discovery of existing contaminants at the site (e.g. pesticide containers or asbestos), including stop work protocols and remediation and disposal requirements.</p> <p>Manage the storage of any potential contaminants onsite.</p> <p>Monitor and maintain spill equipment.</p>	<p>Discovery of Buried Contaminants Protocol (SWMP Appendix D)</p> <p>Spill Response Plan (SWMP Appendix E)</p> <p>Auditing and inspections (SWMP Section 7.7, EMS Section 5.1)</p>
RTS, Appendix A	Resource use and waste generation	Develop a Waste Management Plan (WMP) to minimise wastes. This plan will include tracking of all waste leaving the site.	Waste Management Register (WMP Appendix C)
RTS, Appendix A	Community and socio-economic	<p>Develop and implement a Community Consultation Plan to manage impacts to community stakeholders, including:</p> <p>Protocols to keep the community updated about the progress of the proposal and proposal benefits.</p> <p>Protocols to inform relevant stakeholders of potential impacts (haulage, noise, air quality etc.).</p> <p>Protocols to respond to any complaints received.</p>	Impacts to stakeholders (CCP)
RTS, Appendix A	Hazards	<p>Develop a Bush Fire Management Plan to include measures to:</p> <p>Document all firefighting resources maintained at the site with an inspection and maintenance schedule</p> <p>Monitor and manage vegetation fuel loads</p>	<p>Bushfire Management Plan (FMERP)</p> <p>Auditing and inspections (SWMP Section 7.7, EMS Section 5.1)</p>

### **5.3 NON-COMPLIANCE AND CORRECTIVE AND PREVENTATIVE ACTION**

Environmental non-compliances will be reported and actioned through the Incident Management Procedures detailed in Section 4.7.

Any non-conformance to the system will be dealt with through the audit procedures detailed in Section 5.1.

As per Condition 4 of Schedule 4, Lightsource BP will notify the Department in writing within 7 days after becoming aware of any non-compliance with the CoC.

## 6 MANAGEMENT REVIEW

A Management Review of the EMS and Project plans will be completed at least once during the Project. This will involve the HSEQ Manager and relevant Project team members and stakeholders.

A requirement of Schedule 4 (2) of the CoC states that;

*The Applicant must:*

- (c) update the strategies and plans required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and*
- (d) review and, if necessary, revise the strategies and plans required under this consent to the satisfaction of the Secretary within 1 month of the:*
  - *submission of an incident report under condition 3; or*
  - *any modification to the conditions of consent.*

Amendments to the Project's management documents, risk assessment review, re-evaluation of the Project objectives and targets as well as changes to other Project documents would be conducted in accordance with the Documentation and Document Control procedures outlined in Section 4.6.

## **APPENDIX A ENVIRONMENTAL POLICY**

Environmental Policy attached in PDF – pg 1

Environmental Policy attached in PDF – pg 2

## APPENDIX B ENVIRONMENTAL LEGISLATION

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
<b>Commonwealth Legislation</b>				
<b><i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i></b>	<p>The objects of this Act are:</p> <ul style="list-style-type: none"> <li>• to provide for the protection of the environment, especially matters of national environmental significance</li> <li>• to promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources</li> <li>• to promote the conservation of biodiversity</li> <li>• to provide for the protection and conservation of heritage</li> <li>• to promote a co-operative approach to the protection and management of the environment involving governments, the community, land-holders and indigenous peoples</li> <li>• to assist in the co-operative implementation of Australia’s international; environmental responsibilities</li> <li>• to promote the use of indigenous peoples’ knowledge of biodiversity with the involvement of, and co-operation with, land-holders and indigenous peoples</li> </ul> <p>Under the EPBC Act, any action that has, or is likely to have, a significant impact on a Matter of National Environmental Significance (MNES) may progress only with the approval of the Commonwealth Minister for the Environment.</p>	While no significant impacts on MNES as a result of the Project are considered likely, there is a general duty to avoid impacts to MNES.	None required	Lightsource BP
<b>State Legislation</b>				
<b><i>Environmental Planning and Assessment Act 1979 (EP&amp;A Act)</i></b>	The EP&A Act provides for modifications to consents. Modification provisions are contained in Section 4.55 of the Act. Under this section. The following provisions apply to modifications:	An Environmental Impact Statement (EIS) was completed to assess the impact of the Project. It included the assessment of construction and	Modifications to the Project may require Approval from DPE	Lightsource BP

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
	<ul style="list-style-type: none"> <li>• Modifications involving minimal environmental impact: A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:               <ul style="list-style-type: none"> <li>○ it is satisfied that the proposed modification is of minimal environmental impact, and</li> <li>○ it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and</li> <li>○ it has notified the application in accordance with:</li> <li>○ the regulations, if the regulations so require, or</li> <li>○ a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and</li> <li>○ it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.</li> </ul> </li> <li>• A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:               <ul style="list-style-type: none"> <li>○ it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all), and</li> <li>○ it has consulted with the relevant Minister, public authority or approval body (within the meaning of Division 4.8) in respect of a condition imposed as a requirement of a concurrence to the consent or in accordance with the general terms of an approval proposed to be</li> </ul> </li> </ul>	<p>operational activities along with operation of infrastructure that will affect, or likely to affect the environment. This was approved by the NSW Planning and Assessment Commission as delegate of the Minister for Planning. Compliance with the Conditions of Consent issued by the Commission is a legal requirement of the Project.</p> <p>Work that is additional, or a variation of work approved that was assessed and described in the EIS for this project and was not deemed consistent with the approval will require additional assessment under this legislation.</p>		

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
	<p>granted by the approval body and that Minister, authority or body has not, within 21 days after being consulted, objected to the modification of that consent, and</p> <ul style="list-style-type: none"> <li>○ it has notified the application in accordance with: <ul style="list-style-type: none"> <li>➢ the regulations, if the regulations so require, or</li> <li>➢ a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and</li> </ul> </li> <li>○ it has considered any submissions made concerning the proposed modification within the period prescribed by the regulations or provided by the development control plan, as the case may be.</li> <li>• In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15 (1) as are of relevance to the development the subject of the application. The consent authority must also take into consideration the reasons given by the consent authority for the grant of the consent that is sought to be modified.</li> <li>• The modification of a development consent in accordance with this section is taken not to be the granting of development consent under this Part, but a reference in this or any other Act to a development consent includes a reference to a development consent as so modified.</li> </ul> <p>Section 4.15 identifies matters to be considered in determining a development application, including a modification.</p>			
<b>Roads Act 1993</b>	<p>The Roads Act provides for the classification of roads and for the declaration of the Roads and Maritime Services (RMS) and other public authorities as roads authorities for both classified and unclassified roads. It also regulates the carrying out of various activities in, on and over public roads.</p> <p>Under section 138, the consent of the appropriate roads authority is required to:</p>	<p>The Project would use one access point from Goolma Road for its operation and construction. Goolma Road is a State Road which is managed by RMS. The site access from Goolma Road will be designed and constructed in consultation with RMS to the</p>	<p>Project works requires approval from Roads and Maritime Services and the Minister</p>	<p>Lightsource BP</p>

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
	<ul style="list-style-type: none"> <li>(a) erect a structure or carry out a work in, on or over a public road</li> <li>(b) dig up or disturb the surface of a public road</li> <li>(c) remove or interfere with a structure, work or tree on a public road</li> <li>(d) pump water into a public road from any land adjoining the road</li> </ul> <p>connect a road (whether public or private) to a classified road.</p>	<p>appropriate standard to accommodate the proposed traffic flows during construction and to avoid safety issues. The site access will include construction of a dedicated turning lane from Goolma Road into the site.</p>	Roads works permits	
<b>Water Management Act 2000</b>	<p>The aim of this Act is to ensure that water resources are conserved and properly managed for sustainable use benefiting both present and future generations. It is also intended to provide formal means for the protection and enhancement of the environmental qualities of waterways and in-stream uses, as well as to provide for the protection of catchments.</p> <p>Under Section 91E of the WM Act, an approval is required if a 'controlled activity' is proposed on 'waterfront land.'</p>	<p>Under section 4.41 of the EP&amp;A Act, SSD developments do not require a water use approval under section 89, a water management work approval under section 90 or a controlled activity approval (other than an aquifer interference approval) under section 91 of the WM Act.</p> <p>Even though a Controlled Activity is not required for the works, a 40 m buffer has been applied to waterways within the proposal site.</p> <p>Waterway crossings and services crossing are required to be designed in accordance with 'Guidelines for Controlled Activities on Waterfront Land' (DPI Water).</p> <p>Groundwater bores onsite may be used during construction of the project. If required, a Water Allocation License (WAL) would be obtained.</p>	None required	Lightsource BP
<b>Heritage Act 1977</b>	<p>This Act provides statutory protection and conservation for heritage places and items. The objects of this Act include promoting, understanding, and encouraging the conservation of the State's heritage and the identification and</p>	<p>Under Section 4.41 of the EP&amp;A Act, an approval under Part 4 or a permit under Section 139 of the Heritage Act 1977</p>	None required	Lightsource BP Sub-contractors

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
	<p>registration of items of State heritage significance. The Heritage Act details requirements for the protection of non-Aboriginal heritage items.</p> <p>An application under Section 60 must be made to the Heritage Council Office when making changes to a heritage place listed on the State Heritage Register, or when excavating any land in NSW where an archaeological relic may be disturbed.</p>	<p>would not be required for SSD. Potential impacts on heritage items has been undertaken.</p> <p>One heritage site is located within the Project site (Narrawa Homestead). The site will not be repurposed as the Project's office and maintenance facility as it is not feasible for the homestead to deliver the technical requirements for the plant's operation without adversely impacting on the site's heritage values. Please refer to the documentation that will be provided to DPE to discharge Schedule 2 Condition 8.</p>		
<b>Mining Act 1992</b>	<p>The main objective of the Act is to encourage and facilitate the discovery and development of mineral resources in New South Wales, having regard to the need to encourage ecologically sustainable development.</p>	<p>The Project site has two current Mineral Titles. The holders have been consulted with, and both indicated the Project would likely not significantly impact potential future mining activities. Neither made submissions during the EIS public exhibition period</p>	None required.	Lightsource BP
<b>Protection of the Environment Operations Act 1997 (POEO Act)</b>	<p>The Act enforces licences and approvals relating to air, water and noise pollution and waste management.</p> <p>Section 148 of this Act requires notification of pollution incidents.</p> <p>Section 120 of this Act provides that it an offence to pollute waters.</p> <p>Schedule 1 of this Act describes activities for which an Environment Protection Licence is required. Under section 48, premises-based scheduled activities (as defined in Schedule 1) require an Environment Protection Licence (EPL).</p>	<p>The Project is not a scheduled activity under section 48 of the POEO Act. Therefore, an EPL is not required.</p> <p>Lightsource BP will ensure all phases of the Project are managed to prevent pollution and will comply with notification requirements.</p>	None required.	Lightsource BP Lightsource BP Sub-contractors

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
<p><b>Waste Avoidance and Resource Recovery Act 2001</b></p>	<p>The objectives of this Act are:</p> <ul style="list-style-type: none"> <li>(a) to encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecologically sustainable development,</li> <li>(b) to ensure that resource management options are considered against a hierarchy of the following order:               <ul style="list-style-type: none"> <li>i. avoidance of unnecessary resource consumption,</li> <li>ii. resource recovery (including reuse, reprocessing, recycling and energy recovery),</li> <li>iii. disposal,</li> </ul> </li> <li>(c) to provide for the continual reduction in waste generation,</li> <li>(d) to minimise the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste,</li> <li>(e) to ensure that industry shares with the community the responsibility for reducing and dealing with waste,</li> <li>(f) to ensure the efficient funding of waste and resource management planning, programs and service delivery,</li> <li>(g) to achieve integrated waste and resource management planning, programs and service delivery on a State-wide basis,</li> </ul> <p>to assist in the achievement of the objectives of the <i>Protection of the Environment Operations Act 1997</i>.</p>	<p>Lightsource BP will address the objectives of this Act in Project design, management document development and throughout construction.</p> <p>A Waste Management Plan (WMP) has been developed to minimise wastes.</p>	<p>None required.</p>	<p>Lightsource BP</p>
<p><b>Biodiversity Conservation Act 2016</b></p>	<p>This Act relates to the conservation of biodiversity, including establishing requirements for offsetting cleared native vegetation.</p>	<p>The assessment of onsite biodiversity impacts has been undertaken under the provisions of this Act. During construction, there is an obligation to minimise impacts to native vegetation.</p>	<p>Lightsource BP will comply with offsetting requirements.</p>	<p>Lightsource BP</p>

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
<b>Biosecurity Act 2015</b>	<p>In relation to weeds, the Act:</p> <ul style="list-style-type: none"> <li>• embeds the principle of shared responsibility for weed risk across government, community and industry;</li> <li>• applies equally to all land and waterways in the state, regardless of whether ownership is public or private;</li> <li>• is premised on the concept of risk, so that weed management investment and response is commensurate with the risk posed; and</li> <li>• supports regional planning and management for weeds.</li> </ul> <p>The act includes regulatory tools to manage weed risks.</p> <p>The act establishes a General Biosecurity Duty (GBD): that all plants are regulated with a GBD to prevent, eliminate or minimise any biosecurity risk they may pose. Any person who deals with any plant, who knows (or ought to know) of any biosecurity risk, has a duty to ensure the risk is prevented, eliminated or minimised, so far as reasonably practicable.</p> <p>The Central West Regional Strategic Weed Management Plan 2017 - 2022 (RSWMP) (Central West Local Land Services, 2017), utilises the regulatory tools available in the Biosecurity Act to manage weed risks.</p>	<p>The Biodiversity Management Plan (BMP) incorporates protocols for weed, hygiene and pest management.</p>	<p>BMP will be approved by DPE.</p>	<p>Lightsource BP</p>
<b>Fisheries Management Act 1994 (FM Act)</b>	<p>The FM Act identifies threatened aquatic species, populations, and ecological communities, and requires an assessment of significance for threatened biota which may be impacted by the work.</p> <p>The FM Act sets out to conserve fish stocks and key fish habitats, threatened species, populations and ecological communities of fish and marine vegetation and biological diversity. Further, it aims to promote viable commercial fishing, aquaculture industries and recreational fishing opportunities. Threatened species, populations and ecological communities and key threatening process are listed in the FM Act's Schedules.</p> <p>A permit under Section 201, 205 or 219 of the FM Act is not required by virtue of Section 4.41(b) of the EP&amp;A Act.</p>	<p>The Project site is within the Macquarie-Bogan catchment. The Wellington Key Fish Habitat Map (NSW DPI, 2016) maps Wuuluman Creek as Key Fish Habitat.</p> <p>Specific soil and water mitigation measures will manage the potential impacts the watercourses.</p>	<p>None required.</p>	<p>Lightsource BP</p>

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
<b>National Parks and Wildlife Act 1974</b>	<p>The NPW Act sets out responsibilities for the care, control and management of all national parks, historic sites, nature reserves, reserves, Aboriginal areas and state game reserves and associated permits and approvals.</p> <p>The Act aims to conserve nature, including habitat, ecosystems, ecosystem processes and biological diversity at the community, species and genetic levels. It also aims to conserve objects, places or features of cultural value, including places, objects and features of significance to Aboriginal people, as well as places of historic, architectural or scientific significance.</p> <p>The Act also provides the basis for legal protection and management of Aboriginal sites within NSW. All Aboriginal objects within the state of NSW are protected under Part 6 of this Act. The implementation of the Aboriginal heritage provisions in the NPW Act is the responsibility of the Office of Environment and Heritage (OEH).</p> <p>Under Section 4.41(d) of the EP&amp;A Act, an Aboriginal Heritage Impact Permit under Section 90 of the National Parks and Wildlife Act 1974 would not be required for a State Significant Development.</p>	<p>Aboriginal heritage will be managed in accordance with the Project approval. If any unrecorded Aboriginal objects are encountered during construction, works will cease immediately in that area and in accordance with section 89(A) of the Act, OEH will be notified.</p>	None required	<p>Lightsource BP</p> <p>Lightsource BP sub-contractors</p>
<b>Crown Land Management Act 2016</b>	<p>This Act relates to the management of Crown land.</p>	<p>The assessment of Crown land has been undertaken under the <i>Crown Lands Act 1989</i> under Schedule 7 of the <i>Crown Land Management Act</i> (Savings, transitional and other provisions). The <i>Crown Lands Act</i> was in effect at the time of Project approval.</p>	None required.	Lightsource BP
<b>Crown Lands Act 1989</b>	<p>The objective of the <i>Crown Lands Act</i> is to ensure that Crown land is managed for the benefit of the people of New South Wales. The Catchments and Lands Division, DPI is responsible for the sustainable and commercial management of Crown land.</p>	<p>One Council-owned road is located on the Project site. An application to close this road was made in August 2017 through NSW Crown Lands (Application No. W589205). As of 1 July 2018, NSW Crown Lands no longer has jurisdiction over council roads. The application was</p>		

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
		terminated, and the application fee returned.		
<b>State Environmental Planning Policies</b>				
<b>State Environmental Planning Policy No 33 – Hazardous and Offensive Development</b>	<p>This SEPP defines and regulates the assessment and approval of potentially hazardous or offensive development. The SEPP defines 'potentially hazardous industry' as:</p> <p><i>...development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would pose a significant risk in relation to the locality:</i></p> <p style="margin-left: 40px;"><i>(a) to human health, life or property, or</i> <i>(b) to the biophysical environment,</i></p> <p><i>and includes a hazardous industry and a hazardous storage establishment.</i></p> <p>'Potentially offensive industry' defined as:</p> <p><i>...a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would emit a polluting discharge (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land, and includes an offensive industry and an offensive storage establishment.</i></p>	A Fire Safety Study will be prepared and will guide the FMERP and operational fire risks in accordance with the SEPP.	None required	Lightsource BP

Controlling Legislation	Legislation Requirement	Application to the Project	Approvals/ Permits/ Licenses	Responsibility to comply
<p><b><i>State Environmental Planning Policy No. 55 – Remediation of Land</i></b></p>	<p>The aims of this SEPP are to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment.</p> <p>Clause 7 of the SEPP requires that the remediation of land be considered by a consent authority in determining a development application.</p>	<p>There are no contaminated sites for the Wellington LGA in the EPA contaminated land register (NSW Government, 2017). There is a risk that contamination associated with agricultural activities (e.g., pesticides) could be present on the site, however, given no contaminated sites are recorded on or adjacent to the Project site and no evidence of contamination was observed during the site assessment, this risk is considered very low. In terms of the proposed solar farm, the risk from contamination and the need for remediation prior to the works is considered to be low.</p>	<p>None required</p>	<p>Lightsource BP</p>

## APPENDIX C ENVIRONMENTAL INCIDENT RESPONSE PROCEDURE

### C.1 INTERNAL REPORTING

Any incident that occurs with the potential to cause an environmental impact will be reported immediately to the Site Construction and HSEQ. The Environmental Due Diligence induction will emphasise this obligation to all contractors and personnel working on-site. This procedure details the protocols to be followed in the event of an environmental incident, as distinct from an emergency situation.

### C.2 IMMEDIATE RESPONSE

Upon receiving notification of an incident with the potential to cause an environmental impact the HSEQ will immediately attend the incident. The HSEQ will then:

- Isolate the area affected by the incident;
- Stop works around the area;
- Implement containment measures to prevent the impact of the incident spreading; and
- Make a determination as to the significance of the potential environmental impact and, as appropriate, undertake appropriate external notifications.

### C.3 EXTERNAL NOTIFICATIONS

#### Material Harm

EPA notification is required where a pollution incident occurs in the course of an activity such that material harm to the environment is caused or threatened.

Material harm to the environment is defined in s.147 of *the Protection of the Environment Operations Act 1997* as follows:

- harm to the environment is material if:
  - it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
  - it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- loss includes the reasonable costs and expenses that will be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

The HSEQ, as soon as the immediate response actions have been implemented, will make a determination as to whether material harm has been caused or is threatened.

## **C.4 AGENCY NOTIFICATION**

If the HSEQ determines material harm exists relevant agencies will be immediately notified and provided the following relevant information:

- the time, date, nature, duration and location of the incident;
- the location of the place where pollution is occurring or is likely to occur;
- the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- the circumstances in which the incident occurred (including the cause of the incident, if known); and
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

As part of agencies notification, the HSEQ will inform the DPE of the situation as required by CoC 1 schedule 4 (Table 2-2). This initial notification will be for information purposes and a continued response to the situation and any instruction or request from the agencies will occur. DPE will be notified as soon as practicable and at the same time as the EPA or other agencies. The agencies to be notified include:

- NSW EPA as the appropriate regulatory authority (ARA) on **131 555 (or (02) 9995 5555**
- NSW DPE on **1300 305 695**
- The NSW Ministry of Health **02 9391 9000**
- Safe Work NSW (formerly WorkCover) on **13 10 50**
- The local authority, Warren Shire Council on **(02) 6847 6600** (day time hours)
- Fire and Rescue NSW on **000** or for Mobiles Only **112**
- Rural Fire Service North West Region on **02 6822 4422**

## **C.5 NO MATERIAL HARM**

Where an incident has occurred that has **not** resulted in material harm, the HSEQ will immediately investigate and record the following relevant information:

- the time, date, nature, duration and location of the incident;
- the location of the place where pollution is occurring or is likely to occur;
- the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- the circumstances in which the incident occurred (including the cause of the incident, if known); and
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

This information will be used to establish measures to avoid a reoccurrence or escalation in scale in the future.

## **C.6 INCIDENT INVESTIGATION**

### **Avoid Recurrence**

As soon as the incident has been contained and external notifications undertaken the SECO will then undertake an incident investigation. One purpose of the investigation will be to identify and understand the cause of the incident with a view to modifying procedures to avoid the potential for a recurrence. The types of preventative actions taken could include revision to a Construction Work Method Statement or undertaking targeted Environmental Due Diligence sessions at tool box meetings prior to works re-commencing.

### **Restoration**

The other purpose of the incident investigation will be to define the appropriate remediation work required in order to address any bio-physical impact of the incident. The appropriate remediation work (if required) will be determined by the specific circumstances of the incident.

## **C.7 INCIDENT REPORTING**

### **Documentation**

Any environmental incident will be recorded on an Environmental Incident Report and an updated Environmental Incidents Register will be maintained throughout the construction period.

Each Environmental Incident Report will include details on:

- the date, time and duration of the incident;
- clarify whether there was material harm to the environment;
- detail the nature of the incident;
- climatic conditions;
- the location of the incident;
- pollutants involved;
- circumstances in which the incident occurred; and
- Corrective action taken; external notification (EPA).

## **C.8 DISSEMINATION**






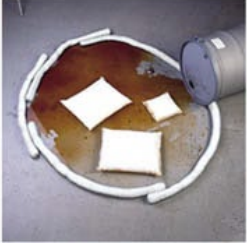

For any environmental incident for which there is no material harm, the HSEQ will file a copy of the incident report follow the investigation. A summary of Environmental Incident Reports will be retained for reporting requirements and made available to agencies on request.


For an incident in which material harm has or could have resulted and the EPA has been notified, the HSEQ will provide reporting to the EPA as may be instructed, in accordance with the timeframes that may be so specified by the EPA.

Copies of any EPA reporting associated with an environmental incident will also be provided to the Department of Planning and Environment and Warren Shire Council.

## APPENDIX D SPILL RESPONSE PLAN

### INSTRUCTION

1.	<p><b>Raise the Alarm</b> / Seek Assistance: Where possible notify your Supervisor/Manager and/or Emergency Services if spill (release) is too large</p>	
2.	<p><b>Stop</b> the spill at the source (if safe to do so):</p> <ul style="list-style-type: none"> <li>▪ Turn off a valve or stabilise the container</li> <li>▪ <b>Never</b> put yourself at risk of harm from the spilled substance</li> </ul>	
3.	<p><b>Secure</b> the spill area/make safe:</p> <ul style="list-style-type: none"> <li>▪ Use barriers or other people to prevent entry</li> </ul>	
	<ul style="list-style-type: none"> <li>▪ Prevent fire/explosion by removing sources of ignition and turning off spark generating equipment</li> </ul>	
4.	<p><b>Identify</b> the substance spilled:</p> <ul style="list-style-type: none"> <li>▪ Determine the danger posed by the substance (e.g. flammable, toxic, explosive, etc.)</li> <li>▪ Is it safe to clean up?</li> <li>▪</li> </ul>	
5.	<p><b>Personal Protection:</b></p> <ul style="list-style-type: none"> <li>▪ <b>Do not</b> attempt to clean up the spill if there is any uncertainty that it can be done safely</li> <li>▪ Wear Personal Protective Equipment (PPE) (e.g. gloves, goggles, coveralls, etc.) if necessary</li> </ul>	
6.	<p><b>Surround</b> the spill: Using absorbent socks or pillows to prevent fluid spreading or entering drains/waterways OR protect areas that can be damaged by the spill (e.g. put a sock in front of the waterway OR create a bund between the spill and the waterway)</p>	
7.	<p><b>Cover</b> the spill area with absorbent pads</p>	
8.	<p><b>Check</b> all areas for further contamination (e.g. drains, soil, etc.)</p>	
9.	<p><b>Disposal</b></p> <ul style="list-style-type: none"> <li>▪ Collect all contaminated material and place in waste bags provided in the spill kit</li> <li>▪ Wear correct Personal Protective Equipment (PPE) (e.g. gloves, masks, etc.) when picking up the socks and pads</li> <li>▪ Waste to be disposed of at a licensed site</li> </ul>	

10.	<p><b>Reporting</b> Record cause of spill and outcome to Site Supervisor/Manager or HSE Advisor such that a Hazard and Incident Report (Form FM-11) can be completed</p>	
11.	<p><b>Restock</b> Spill Kit</p> <ul style="list-style-type: none"> <li>▪ Ensure that any equipment used during the response is checked and replaced as necessary</li> <li>▪ Refer to Spill Kit Inventory List below for item and quantity</li> </ul>	

### SPILL KIT INVENTORY LIST

#### 240L General Purpose Spill Response Kit

PRODUCT	QUANTITY
<b>Absorbents</b>	
Hydrocarbon Absorbent Sock – 3m	6
Hydrocarbon Absorbent Pad	25
<b>Clean Up implements</b>	
Waste Bags and Cable Ties	5
Hydrocarbon Resistant Gloves	2
Disposable Coveralls	1

#### 120L General Purpose Spill Response Kit

PRODUCT	QUANTITY
<b>Absorbents</b>	
Hydrocarbon Absorbent Sock – 3m	2
Hydrocarbon Absorbent Pad	5
<b>Clean Up implements</b>	
Waste Bags and Cable Ties	5
Hydrocarbon Resistant Gloves	2
Disposable Coveralls	1

## APPENDIX E EMS CONSULTATION SUMMARY

Draft plan sent to the NSW Department of Planning on the June 6 2019. A response was received from the DPE on the 1 August 2019			
Issue	NSW Planning Comment/Issue	NSW Planning Action Required	Response
1 (c)	<p><b>Section 4.1 (Structure and Responsibility)</b></p> <p>Table 4-1 states that there will be three teams responsible for the construction of the project: Lightsource PB, the Engineering Procurement Contractor (EPC) and construction subcontractors.</p> <p>However, Table 4.1.2 does not include construction sub - contractors' roles and responsibilities.</p> <p>Table 4.1 states that the EPC contractor is the manager of the construction of the project and that the construction subcontractors are involved in the construction of the Project.</p> <p>However, Table 4.1.2 states that the authority to report incidents is with Lightsource BP.</p> <p>Given that condition 3, Schedule 4 of Project Approval SSD 8573 states that the Department must be notified in writing immediately after the Applicant becomes aware of an incident, Table 4.1.2 is incontinent with the incident reporting requirements.</p> <p>Incidents should be reported immediately to the Department as required by the Project Approval.</p>	<p>Please include subcontractor roles and responsibilities in Table 4.1.2.</p> <p>Please review Section 4.1.2 in relation to reporting incidents and meeting the requirement of condition 3, Schedule 4 of the Project Approval.</p>	<p>Subcontractors added to Table 4-1</p> <p>Non-compliance in accordance with Sched 4 Condition 3 added to Table 4-1</p>
1 (d)	<p><b>Section 4.4.2 (Government Authority Communication)</b></p> <p><b>Section 4.4.3 (Stakeholder and Community Consultation)</b></p> <p>Section 4.4.2 does not include requirements under the Project Approval in relation to notifying the department of the details of the project operations and environmental performance, including:</p> <ul style="list-style-type: none"> <li>notifying the department prior to the commencement of construction, operations, upgrading or decommissioning of the development;</li> <li>submitting the results of the Independent Environmental Audit to the Secretary within 3 months of commencing the Independent Environmental Audit.</li> </ul>	<p>Please update Section 4.4.2 to meet the requirements of condition 3, Schedule 4.</p>	<p>Amended: Sched 4 Condition 3 and Cond 4 have been added to 4.4.2</p>
1 (d)	<p><b>Section 4.7 (Emergency Preparedness and Response) and Section 5.3 (Non-Compliance and Corrective and Preventative Action)</b></p> <p>Section 4.7.1 states that environmental incidents will be notified verbally to the Site Manager immediately and that Lightsource PB would be notified in writing within 1 hour of any incident occurring.</p> <p>In addition, Section 4.7.1 states that Lightsource PB will immediately notify the Secretary and any other relevant agencies of any incident.</p> <p>However, condition 3, Schedule 4 of Project Approval SSD 8573 states that the Department must be notified in writing immediately after the Applicant becomes aware of an incident.</p>	<p>Please review Section 4.1.2 in relation to reporting incidents and meeting the requirement of condition 3, Schedule 4 of the Project Approval.</p>	<p>Amended: Sched 4 Condition 3 and Cond 4 have been addressed in 4.1.2</p>

Draft plan sent to the NSW Department of Planning on the June 6 2019. A response was received from the DPE on the 1 August2019			
Issue	NSW Planning Comment/Issue	NSW Planning Action Required	Response
<b>1 (e)</b>	A summary of monitoring and reporting is provided in Table 5-1.	The department requires this to be shown on a figure	The table provides a clear plan as per the requirement. It is not possible to show the requirements clearly in a figure. As such, a table has been used to document and described the monitoring. If there is an example of the required figure, NGH would be willing to reformat if appropriate.
<b>General</b>	Page 5 states that the construction period will last up to 12 months from the commencement of site establishment works and include a peak period of 6 months. However, page 13 of the Traffic Management Plan also states that the construction phase of the project will continue for a period of approximately 12 months for the solar farm and 6 months for the Energy Storage Facility. Please clarify on page 5 of the draft EMS if the total construction time will for the solar farm and Energy Storage Facility will be 12 months or a total of 18 months.		The total construction time for the wind farm and ESF will be 12 months. If for any circumstance the time frame for construction of the solar farm or any subsequent modification extends the construction time frame the EMS will be updated to reflect the newly approved activity.

Further comment was received NSW Department of Planning on the December 18 2019			
Issue	NSW Planning Comment/Issue	NSW Planning Action Required	Response

## **APPENDIX F AGENCY APPROVAL OF EMS**



Diana Mitchell  
Principal Environmental Planner  
Lightsource BP  
Level 5, 383 George Street  
SYDNEY NSW 2000

20/12/2019

Dear Ms Mitchell

**Wellington Solar Farm (SSD 8573)  
Environmental Management Strategy**

I refer to your request seeking the Secretary's approval of the *Environmental Management Strategy* (version 3.1, dated 19 December 2019) for the Wellington Solar Farm (SSD 8573).

The Department has carefully reviewed the document and is satisfied that the strategy generally addresses the applicable requirements of condition 1 of Schedule 4 of development consent SSD 8573.

Accordingly, the Secretary has approved the *Environmental Management Strategy* (version 3.1, dated 19 December 2019). Please ensure that the approved strategy is placed on the project website at the earliest convenience.

If you wish to discuss the matter further, please contact Rob Beckett on 02 9274 6388 or via email at [Rob.Beckett@planning.nsw.gov.au](mailto:Rob.Beckett@planning.nsw.gov.au).

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Nicole Brewer', with a horizontal line extending to the right.

Nicole Brewer  
Director  
Energy Assessments

As nominee of the Secretary