

AGL Macquarie SSD 8889679 2022 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
SSD 9697 Non-Compliance Recommendations				
Schedule 2, Condition A2	The development may only be carried out: (a) in compliance with the conditions of this consent	Non-compliances with SSD 8889679 conditions were identified during this IEA and described below and in Appendix C .	Refer to actions throughout this table	Refer to actions throughout this table
Schedule 2, Condition B12(a)	The Applicant must: (a) ensure that noise generated by any construction is managed in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version; and	Records were not available at the time of audit to confirm that monitoring described in Section 7 of the NMP had been completed to verify that project noise impacts against modelling predictions.	It must be noted that the work area is small, there are no sensitive noise receptors for at least 5km, there are other noisier sources in the area (mines, Liddell Power Station) and works are during the day only. The Noise Management Plan will be updated to clarify which stages of the project will require current stage doesn't require noise monitoring.	07/07/2023*

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B12(b)	The Applicant must: (b) take all reasonable and feasible steps to minimise noise from construction and operational activities.	No evidence was available at the time of the audit to confirm that reasonable and feasible steps to minimise noise from construction and operational activities have been implemented for the project.	It must be noted that the work area is small, there are no sensitive noise receptors for at least 5km, there are other noisier sources in the area (mines, Liddell Power Station) and works are during the day only. The Noise Management Plan will be updated to clarify the steps to be undertaken for this stage of the project.	07/07/2023*

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Schedule 2, Conditions C1(d), C19(a), C19(b)	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: d) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent; (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;	A current copy of the complaints register was not available on the AGL website at the time of the audit. It is recommended that the project complaints register is regularly updated and made available on the AGL website.	All required documents are now available on the AGLM website.	Completed
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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
	(vi) how complaints about the development can be made; (vii) a complaints register; (viii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (ix) any other matter required by the Planning Secretary; a (b) keep this information up to date.			
Schedule 2, Condition C14	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Written approval from DPE for JBA to complete the audit occurred after commencement of this IEA.	This will be completed as required.	Prior to the next triggered Independent Environmental Audit under SSD 8889679.
Schedule 2, Condition C17	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	IEA report and AGL response has exceeded the two-month requirement for submission to the Planning Secretary.	This will be completed as recommended.	05/05/2023

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition D1	The development of the Low Pressure Pump Station Stabilisation is to be undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the following document: GHD (2018) <i>Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report</i>.	No evidence was available at the time of the audit to confirm the development of the Low Pressure Pump Station Stabilisation was undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the GHD (2018) <i>Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report</i>.	These works have been completed in past years prior to the audit period. AGLM will perform a gap analysis against this plan and works completed to date and gather necessary evidence of completion.	03/11/2023
Schedule 2, Condition D3	The development of the Ravensworth Coal Unloader Facility must be carried out in accordance with the following document: HLA Envirosciences (1997) <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i>.	No evidence was available at the time of the audit to confirm the development of the Ravensworth Coal Unloader Facility was carried out in accordance with HLA Envirosciences (1997) <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i>.	The Ravensworth Coal Unloader (also known as Newdell) has not been operated for 2 years and is effectively in Care and Maintenance. Construction (development) of this area was completed in previous years prior to the audit period.	03/11/2023

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition D4	The applicant is to liaise with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line.	No evidence was available at the time of the audit to confirm AGL has liaised with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line.	Aurizon are in constant contact with rail operators regarding scheduling of trains and traffic movements. Aurizon perform raiiling on behalf of AGLM. AGLM will source suitable evidence for this obligation.	04/08/2023
Schedule 2, Condition D6	APPROVAL IN ACCORDANCE WITH PLANS - The development of the Coal/Rail Unloader Augmentation must be carried out generally in accordance with the development application and accompanying plans described as described in the following document: HLA Envirosciences (1997) <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> .	No evidence was available at the time of the audit to confirm the development of the Coal/Rail Unloader Augmentation was carried out generally in accordance with DA 401_2000 and accompanying HLA Envirosciences (2000) <i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i> .	The Ravensworth Coal Unloader (also known as Newdell) has not been operated for 2 years and is effectively in Care and Maintenance. Construction (development) of this area was completed in previous years prior to the audit period.	03/11/2023
SSD 8889679 General Improvement Recommendations				

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition A12(a)	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition;	It is recommended that maintenance records for all project plant and equipment is retained to confirm these activities are being carried out.	Maintenance records will be sought from contractors undertaking works going forward.	Ongoing
Schedule 2, Condition A12(b)	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (b) operated in a proper and efficient manner.	It is recommended that project SWMS are signed and dated prior to starting the job and that signed copies are retained.	This will be completed going forward.	Ongoing
Schedule 2, Condition B12(a)	The Applicant must: (a) ensure that noise generated by any construction is managed in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version;	It is recommended that AGL commission construction noise monitoring for the project, in accordance with Section 7 of the approved NMP. It is also recommended that noise generated by construction for the project is managed in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version and evidence is retained.	It must be noted that the work area is small, there are no sensitive noise receptors for at least 5km, there are other noisier sources in the area (mines, Liddell Power Station) and works are during the day only. The Noise Management Plan will be updated to clarify the steps to be undertaken for this stage of the project.	07/07/2023*

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition B12(b)	The Applicant must: (b) take all reasonable and feasible steps to minimise noise from construction and operational activities.	It is recommended that reasonable and feasible steps to minimise noise from construction and operational activities is implemented and evidence is retained.	It must be noted that the work area is small, there are no sensitive noise receptors for at least 5km, there are other noisier sources in the area (mines, Liddell Power Station) and works are during the day only. The Noise Management Plan will be updated to clarify the steps to be undertaken for this stage of the project.	07/07/2023*
Schedule 2, Condition B13	All construction work at the premises must be conducted between 7 am and 6 pm Monday to Friday and between 8 am and 1 pm Saturdays and at no time on Sundays and public holidays, unless an out of hours protocol is included within an approved Construction Environment Management Plan or the Planning Secretary agrees otherwise.	It is recommended that the sign in / sign out register is implemented on site and completed copies are retained to confirm compliance with approved construction hours.	Sign in/out register is available onsite to compliance with approved construction hours.	Completed

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Conditions C1(d), C19(a)(viii)	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: (d) describe the procedures that would be implemented to: The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (viii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and	It is recommended that the project complaints register is regularly updated and made available on the AGL website.	All required documents are now available on the AGLM website.	Completed

AGL Macquarie SSD 8889679 2022 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition C1(d)	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: (d) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and	Evidence that non-compliances are being entered into AGL 'myHSE' system was not available at the time of the audit. It is recommended that AGL enter any non-compliances into myHSE and records are retained.	There were no incidents associated with this SSD to date. Any incident records will be duplicated in MyHSE if relevant.	Ongoing
Schedule 2, Condition C5	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	It is recommended that AGL notify DPE of the non-compliances identified in this audit report within seven days of the document date.	This will be completed in the submission letter for this audit report.	05/05/2023
Schedule 2, Condition C14	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	It is recommended that AGL obtains an endorsement letter for the proposed independent audit team from the DPE prior to next audit.	This will be completed as recommended.	Prior to the next audit under SSD 8889679.

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition C17	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	It is recommended that AGL submit this IEA report and their response to DPE as soon as possible following completion of this audit report.	This will be completed as recommended.	05/05/2023

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition C19	The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent; (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vi) how complaints about the development can be made; (vii) a complaints register; (viii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (ix) any other matter required by the Planning Secretary; and (b) keep this information up to date.	It is recommended that all project information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) noted in Schedule 2, Condition C19 are made publicly available on the AGL website.	All required documents are now available on the AGLM website.	Ongoing

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition D1	The development of the Low Pressure Pump Station Stabilisation is to be undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the following document: GHD (2018) <i>Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report</i> .	It is recommended that AGL retains evidence to confirm that the development of the Low Pressure Pump Station Stabilisation was undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the GHD Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report prior to surrender of the DA 8.2018.273.2 under Schedule 2, Condition A5 of SSD 8889679.	These works have been completed in past years prior to the audit period. AGLM will perform a gap analysis against this plan and works completed to date and gather necessary evidence of completion.	03/11/2023
Schedule 2, Condition D3	The development of the Ravensworth Coal Unloader Facility must be carried out in accordance with the following document: HLA Envirosciences <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> .	It is recommended that AGL retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.	The Ravensworth Coal Unloader (also known as Newdell) has not been operated for 2 years and is effectively in Care and Maintenance. Construction (development) of this area was completed in previous years prior to the audit period.	03/11/2023

AGL Macquarie SSD 8889679 2022 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
Schedule 2, Condition D4	The applicant is to liaise with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line.	It is recommended that AGL retain evidence that confirms consultation with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.	Aurizon are in constant contact with rail operators regarding scheduling of trains and traffic movements. Aurizon perform raiiling on behalf of AGLM. AGLM will source suitable evidence for this obligation.	04/08/2023
Schedule 2, Condition D6	APPROVAL IN ACCORDANCE WITH PLANS - The development of the Coal/Rail Unloader Augmentation must be carried out generally in accordance with the development application and accompanying plans described as described in the following document: Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation	It is recommended that AGL retain evidence that confirms the development of the Coal/Rail Unloader Augmentation is carried out generally in accordance with the development application and accompanying plans prior to surrender of the DA 401_2000 under Schedule 2, Condition A5 of SSD 8889679.	The Ravensworth Coal Unloader (also known as Newdell) has not been operated for 2 years and is effectively in Care and Maintenance. Construction (development) of this area was completed in previous years prior to the audit period.	03/11/2023
EIS Commitments Non-Compliances				

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
HR2	Design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels	No evidence was available at the time of the audit that confirms design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels.	This commitment is more relevant to future stages of works approved under SSD 8889679. No equipment had been installed at the time of the audit. This will be completed as recommended.	As required.
HR3	Risks associated with the Project will be managed through a Management of Change process. AGLM implements an Asset Change Management Standard, and any major change (defined as a change that has major implications to the strength, stability, operation and design of the asset and/or health and safety of employees) must undergo a detailed risk assessment using the AGL Risk Management and Assessment Standard to assess the risks that may be introduced by the proposed change. This will be undertaken for all Project components and appropriate controls implemented to reduce the risk to an acceptable level.	Evidence that a Management of Change Process was completed for the project was not available at the time of audit.	Project is still ongoing so. This will be completed as recommended.	03/11/2023
HR6	Appropriately stocked emergency spill kits will be available at all work areas at all times. All staff will be made aware of the location of the spill kit and trained in its use.	No evidence was available at the time of the audit to confirm that all staff have been trained the use of the spill kits in place at the project construction area.	Minor amounts of chemicals and hydrocarbons are stored at the project facility.	As required.

AGL Macquarie SSD 8889679 2022 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
AQ2	During loading and unloading of materials, the following will be undertaken: - Water sprays as applicable - Minimising drop heights Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions.	Evidence was not available at the time of the audit to confirm dust mitigation controls are implemented during the loading and unloading of materials.	Disturbance area is small. No dust emissions were observed on the day of inspection. Region was at the end of a La Nina, with significant rainfall. This will be implemented for future stages of the project as required.	As required
AQ3	While hauling materials in trucks, the following will be undertaken: Regular watering of unsealed haulage routes Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials on to the adjacent road network.	No evidence was available at the time of the audit to confirm that regular watering of unsealed haulage routes and regular inspection and removal of debris from plant and equipment is occurring for the project.	Disturbance area is small. No dust emissions were observed on the day of inspection. Region was at the end of a La Nina, with significant rainfall. This will be implemented for future stages of the project as required.	As required
AQ5	Activities will be coordinated between the Project and the WOAOW project to limit the potential for cumulative dust impacts where possible.	Evidence was not available at the time of the audit to confirm that management of cumulative dust impacts has been considered between AGL and WOAOW project team.	The decoupler construction project disturbance footprint is very small and works are a significant distance from minor disturbance associated with the current WOAOW works (Ravensworth Ash Line). This process will be put in place.	07/07/2023

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
AQ6	The following will be undertaken to manage wind erosion from stockpiles and exposed surfaces: Watering stockpiles and exposed surfaces Progressive rehabilitation of exposed surfaces (as feasible) where no longer required for construction.	Evidence was not available at the time of the audit to confirm that watering stockpiles and exposed surfaces is being undertaken for the project.	Disturbance area is small. No dust emissions were observed on the day of inspection. Region was at the end of a La Nina, with significant rainfall. This will be implemented for future stages of the project as required.	As required
TT1	The haulage contractor will prepare and implement a Construction Traffic Management Plan (CTMP) for oversized overmass vehicle movements, which will include: - Identification of the routes - Measures to provide an escort for the loads - Times of transporting to minimise impacts on the road network Communication of strategy and liaising with emergency services and police.	The Traffic Management Plan notes that the haulage contractor will prepare and implement a CTMP for oversized overmass vehicle movements, which was not available at the time of the audit.	This was not triggered at the time of the audit, first equipment that would trigger this may be the decoupler equipment. This is mostly related to battery infrastructure. This will be implemented as required.	As required

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
TT2	An oversized vehicle permit will be sought for all oversized overmass (OSOM) movements where required. The OSOM movements would be in accordance with the permit requirements and be outside of peak traffic periods where possible.	Copies of oversized vehicle permits were not available at the time of the audit.	This was not triggered at the time of the audit, first equipment that would trigger this may be the decoupler equipment. This is mostly related to battery infrastructure. Permits will be sought as required for future stages of works under SSD 8889679.	As required
BIO8	Where possible, avoid entering areas of significant weed infestations with machinery or personnel. Weed infestations are predominantly located in the Exotic grassland areas, or the PCT 1691 'regrowth' areas mapped within the development site (Figure 5-2).	No evidence was available at the time of the audit that confirmed machinery or personnel avoid entering areas of significant weed infestations.	Weed records will be maintained for future stages of works under SSD 8889679.	Ongoing

AGL Macquarie SSD 8889679 2022 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
BIO9	If required, weed control will be undertaken by suitably qualified and/or experienced personnel. This may include: - Manual weed removal in preference to herbicides. - Replacing non-target species removed/killed as a result of weed control activities. - Protecting Non-target species from spray drift. - Using only herbicides registered for use within or near waterways for the specific target weed. - Not applying herbicide if it is raining or if rain is expected. - Mixing and loading herbicides and cleaning equipment away from waterways and drains. The CEMP will detail the procedures for management of weeds on the development site (which will be in accordance with the requirements of the Biosecurity Act 2015).	Evidence of weed control for the project was not available at the time of the audit.	Weed records will be maintained for future stages of works under SSD 8889679.	Ongoing
BIO10	During the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species.	The EMS notes that the CEMP will detail the procedures for management of weeds on the development site, however a copy of the CEMP was not available at the time of the audit.	AGLM will update the CEMP with these measures as recommended in future stages.	ongoing

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
BIO11	Ensure vehicle and machinery hygiene measures are applied during construction and operation. Vehicle washdowns may be required for removal of mud and plant materials.	Evidence was not available at the time of the audit to confirm that vehicle and machinery hygiene measures have been applied during construction.	AGLM will update the CEMP with these measures as recommended.	Ongoing
BIO12	Pathogen management measures will be implemented to prevent introduction and spread of amphibian chytrid fungus, <i>Phytophthora cinnamomi</i> and Exotic Rust Fungi. The CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases.	The EMS notes the CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases, however a copy of the CEMP was not available at the time of the audit.	AGLM will update the CEMP with these measures as recommended.	07/07/2023*
V1	Retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible.	Detailed designs for the project were not available at the time of the audit to confirm that retention and enhancement of existing landscape features (areas of scrub, individual trees) was considered.	This is not relevant to this stage of the development. Aerial imagery provided shows the area was sparsely vegetated with no relevant vegetation in place, and was in industrial land associated with a power station. This will be completed for future stages of the project as required.	As required.

AGL Macquarie SSD 8889679 2022 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
V2	Colour of proposed structures and built form will be considered in a suitable muted palette to visually integrate the Project within the landscape where possible. Where a muted palette is not possible, such as for the battery enclosures, AGLM will consider the use of vegetation screen instead.	Detailed designs that confirm colour proposed for permanent infrastructure were not available at the time of the audit.	This was not relevant for this stage of the development. Electrical infrastructure for the decoupler cannot be painted for safety reasons. This commitment was intended to apply to future stages of works approved under SSD 8889679. This will be completed for future stages as required.	As required.
V3	Where possible, consider minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare.	Detailed designs that confirm the consideration of minimal use of reflective surfaces was not available at the time of the audit.	No construction had been completed at the time of the audit. This will be considered where appropriate, particularly for the battery project.	As required
V6	- All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and will be removed from the site following the completion of construction - Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality On completion of the work disturbed areas will be stabilised and rehabilitated.	Evidence was available at the time of the audit to confirm that spraying with water or covering of stockpiles to reduce dust emissions is occurring.	Disturbance area is small. No dust emissions were observed on the day of inspection. Region was at the end of a La Nina, with significant rainfall. This will be implemented for future stages of the project as required.	As required

AGL Macquarie SSD 8889679 2022 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
SE3	Consultation with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.	Evidence was not available at the time of audit to confirm that consultation has occurred with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.	This will be completed as recommended.	As required.
I2	AGLM will consult with Ausgrid as the network provider responsible for other onsite supply regarding continued supply.	No evidence was available at the time of the audit to confirm that AGL has consulted with Ausgrid regarding continued supply as a result of the project.	Not triggered in Stage 1 work.	
CL1	The CEMP will include a process to review and update management measures if any other development commences in proximity to the Project.	A process to review and update management measures if any other development commences in proximity to the Project is not included in any management plan for the Project.	AGLM will update the CEMP with these measures as recommended.	07/07/2023*
SSD 9697 EIS Commitment General Improvement Recommendations				

AGL Macquarie SSD 8889679 2022 Independent Environmental Audit Recommendations and Proposed Actions in Response

Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
HR2	Design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels	It is recommended that AGL documents the design and selection process to ensure all electrical equipment considers EMF levels and complies with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels.	This commitment is more relevant to future stages of works approved under SSD 8889679. No equipment had been installed at the time of the audit. This will be completed as recommended.	As required.
HR3	Risks associated with the Project will be managed through a Management of Change process. AGLM implements an Asset Change Management Standard, and any major change (defined as a change that has major implications to the strength, stability, operation and design of the asset and/or health and safety of employees) must undergo a detailed risk assessment using the AGL Risk Management and Assessment Standard to assess the risks that may be introduced by the proposed change. This will be undertaken for all Project components and appropriate controls implemented to reduce the risk to an acceptable level.	It is recommended that a Management of Change process is completed for the project, in accordance with the relevant AGL Standard.	Project is still under construction and this will be completed as recommended.	03/11/2023
HR6	Appropriately stocked emergency spill kits will be available at all work areas at all times. All staff will be made aware of the location of the spill kit and trained in its use.	It is recommended that all project staff will be made aware of the location of the spill kit and trained in its use, with training records retained.	Awareness communication will be delivered to project personnel.	07/07/2023

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
AQ2	During loading and unloading of materials, the following will be undertaken: • Water sprays as applicable • Minimising drop heights • Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions.	It is recommended that AGL document the implementation of control measures for project loading and unloading activities.	Disturbance area is small. No dust emissions were observed on the day of inspection. Region was at the end of a La Nina, with significant rainfall. This will be implemented for future stages of the project as required.	As required

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
AQ3	While hauling materials in trucks, the following will be undertaken: - Regular watering of unsealed haulage routes - Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials on to the adjacent road network.	It is recommended that AGL retains evidence that confirms watering of unsealed haulage routes and regular inspection and removal of debris from plant and equipment is occurring for the project.	Disturbance area is small. No dust emissions were observed on the day of inspection. Region was at the end of a La Nina, with significant rainfall. The area is cut and fill, haul route is the small decoupler construction area only. Light vehicles are not required to enter the disturbed area regularly, and earthmoving equipment is mainly kept to the disturbance area with minimal tracking on internal roads. Tracking of materials will apply to demobilisation only, and no equipment had been demobilised at the time of the audit as construction was ongoing. This will be completed as required.	As required

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
AQ5	Activities will be coordinated between the Project and the WOAOW project to limit the potential for cumulative dust impacts where possible.	It is recommended that activities are coordinated between the Project and the WOAOW project team to limit the potential for cumulative dust impacts where possible.	The decoupler construction project disturbance footprint is very small and works are a significant distance from minor disturbance associated with the current WOAOW works (Ravensworth Ash Line). This process will be put in place.	07/07/2023
AQ6	The following will be undertaken to manage wind erosion from stockpiles and exposed surfaces: • Watering stockpiles and exposed surfaces • Progressive rehabilitation of exposed surfaces (as feasible) where no longer required for construction.	It is recommended that AGL undertake watering of stockpiles and exposed surfaces to manage wind erosion.	Disturbance area is small. No dust emissions were observed on the day of inspection. Region was at the end of a La Nina, with significant rainfall. Minimal stockpiles were used due to nature of cut and fill. This will be implemented for future stages of the project as required.	As required

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
TT1	The haulage contractor will prepare and implement a Construction Traffic Management Plan (CTMP) for oversized overmass vehicle movements, which will include: • Identification of the routes • Measures to provide an escort for the loads • Times of transporting to minimise impacts on the road network Communication of strategy and liaising with emergency services and police.	It is recommended that the haulage contractor prepares and implements a Construction Traffic Management Plan (CTMP) for oversized overmass vehicle movements associated with the project.	This was not triggered at the time of the audit, first equipment that would trigger this may be the decoupler equipment. This is mostly related to battery infrastructure. This will be implemented as required.	As required
TT2	An oversized vehicle permit will be sought for all oversized overmass (OSOM) movements where required. The OSOM movements would be in accordance with the permit requirements and be outside of peak traffic periods where possible.	It is recommended that an oversized vehicle permit will be sought for all OSOM movements where required.	This was not triggered at the time of the audit, first equipment that would trigger this may be the decoupler equipment. This is mostly related to battery infrastructure. Permits will be sought as required for future stages of works under SSD 8889679.	As required
BIO1	Exclusion zones, or 'No-Go' zones, will be mapped in CEMP and mapping made available to all construction personnel.	It is recommended that copies of completed site inductions which communicate the location of any 'No Go Zones' are retained.	AGLM will update the CEMP with these measures as recommended.	07/07/2023*

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
BIO8	Where possible, avoid entering areas of significant weed infestations with machinery or personnel. Weed infestations are predominantly located in the Exotic grassland areas, or the PCT 1691 'regrowth' areas mapped within the development site (Figure 5-2).	It is recommended that AGL ensures that where possible, machinery or personnel avoid entering areas of significant weed infestations.	Weed records will be maintained for future stages of works under SSD 8889679.	Ongoing
BIO9	If required, weed control will be undertaken by suitably qualified and/or experienced personnel. This may include: • Manual weed removal in preference to herbicides. • Replacing non-target species removed/killed as a result of weed control activities. • Protecting Non-target species from spray drift. • Using only herbicides registered for use within or near waterways for the specific target weed. • Not applying herbicide if it is raining or if rain is expected. • Mixing and loading herbicides and cleaning equipment away from waterways and drains. The CEMP will detail the procedures for management of weeds on the development site (which will be in accordance with the requirements of the Biosecurity Act 2015).	It is recommended that any weed control for the project is undertaken by suitably qualified and/or experienced personnel and records are retained.	Weed records will be maintained for future stages of works under SSD 8889679.	Ongoing

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
BIO10	During the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species.	It is recommended that during the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species and records are retained.	Clearing has been completed for this stage of works. Weed records will be maintained for future stages of works under SSD 8889679.	Ongoing
BIO11	Ensure vehicle and machinery hygiene measures are applied during construction and operation. Vehicle washdowns may be required for removal of mud and plant materials.	It is recommended that AGL ensures vehicle and machinery hygiene measures are applied during construction and records retained.	AGLM will update the CEMP with these measures as recommended.	07/07/2023*
BIO12	Pathogen management measures will be implemented to prevent introduction and spread of amphibian chytrid fungus, Phytophthora cinnamomi and Exotic Rust Fungi. The CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases.	It is recommended that project documentation is updated to include a protocol for construction vehicles driving to and from site to prevent the spread or introduction pathogens on site.	AGLM will update the CEMP as recommended.	07/07/2023*

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
V1	Retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible.	It is recommended that AGL retain copies of detailed designs for the project that confirms retention and enhancement of existing landscape features.	This is not relevant to this stage of the development. Aerial imagery provided shows the area was sparsely vegetated with no relevant vegetation in place, and was in industrial land associated with a power station. This will be completed for future stages of the project as required.	As required.
V2	Colour of proposed structures and built form will be considered in a suitable muted palette to visually integrate the Project within the landscape where possible. Where a muted palette is not possible, such as for the battery enclosures, AGLM will consider the use of vegetation screen instead.	It is recommended that AGL retain copies of Detailed designs that confirm colour proposed for permanent infrastructure.	This was not relevant for this stage of the development. Electrical infrastructure for the decoupler cannot be painted for safety reasons. This commitment was intended to apply to future stages of works approved under SSD 8889679. This will be completed for future stages as required.	As required.

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
V3	Where possible, consider minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare.	It is recommended that AGL retain copies of detail design documents to confirm the consideration of minimal use of reflective surfaces in project infrastructure.	No construction had been completed at the time of the audit. This will be considered where appropriate, particularly for the battery project.	As required
V5	Mitigation tree and shrub planting will be considered to visually integrate the Project within the surrounding landscape.	It is recommended that AGL consider mitigation tree and shrub planting to visually integrate the Project within the surrounding landscape and document the findings of this review.	This is not relevant to this stage of the development. Aerial imagery shows the area was sparsely vegetated with no relevant vegetation in place, and was in industrial land associated with a power station. This will be considered for future stages of works under SSD 8889679.	As required

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Condition Reference	Context	Recommendation	Action Proposed by AGLM	By When
SE3	Consultation with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.	It is recommended that AGL consults with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.	The decoupler was time critical, driven by the pending closure of Liddell Power Station. This commitment was intended for the transport of large battery equipment which would disrupt tourist traffic - only relatively small equipment was moved for this stage of the decoupler. This consultation will be completed as required prior to future relevant stages of works under SSD 8889679.	As required
I2	AGLM will consult with Ausgrid as the network provider responsible for other onsite supply regarding continued supply.	It is recommended that AGLM document consultation with Ausgrid regarding continued supply.	This consultation will be completed as required.	As required
CL1	The CEMP will include a process to review and update management measures if any other development commences in proximity to the Project.	It is recommended that a process to review and update management measures if any other development commences in proximity to the Project is included within the project EMS.	The CEMP will be updated as recommended.	07/07/2023*

* Date of submission to DPE. AGLM have no control of approval dates.