

LIDDELL BATTERY AND BAYSWATER ANCILLARY WORKS

INDEPENDENT ENVIRONMENTAL AUDIT

for AGL Macquarie Pty Limited

19 April 2024



DOCUMENT CONTROL

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Client	AGL Macquarie Pty Limited
Client Address	Locked Bag 14120 MCMC, Melbourne VIC 8001
Author	James Bailey & Associates Pty Ltd
Author Address	6/127-129 John Street, Singleton NSW 2330
Our Reference	240419 Liddell Battery and Bayswater Ancillary Works IEA

LIMITATIONS OF REPORT

In preparing this Independent Environmental Audit on behalf of AGL Macquarie Pty Limited, James Bailey and Associates has assessed all activities appropriate and necessary to evaluate the environmental status of the site during the audit period. James Bailey and Associates has addressed all technical matters which might reasonably be considered to be relevant to such an audit conducted to standards which apply in New South Wales. Based on discussions with appropriate staff and a review of available documentation, it is James Bailey and Associates' opinion that the potential critical environmental issues associated with the site and operations are those discussed in this report. However, James Bailey and Associates can only advise on the basis of the information available to them and therefore cannot dismiss absolutely the possibility that parts of the site, or adjacent properties, may give rise to additional issues.

The conclusions presented in this report are professional opinions based solely upon James Bailey and Associates' interpretation of the documentation reviewed, interviews and conversations with personnel knowledgeable about the site and other available information, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated.

This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation, or to draw conclusions as to whether any particular circumstances constitute a breach of relevant legislation.

CONTENTS

1. INTRODUCTION	1
1.1 Background	1
1.2 Audit Team	1
1.3 Audit Objectives	1
1.4 Audit Scope	1
1.5 Audit Period	2
2. AUDIT METHODOLOGY	4
2.1 Overview	4
2.2 IEA Preparation	4
2.3 Compliance Evaluation	4
2.4 Site Inspection	5
2.4.1 Opening Meeting	5
2.4.2 Site Overview and Orientation Session	5
2.4.3 IEA Interviews	5
2.4.4 Focused Site Inspection	5
2.4.5 Site Documentation Review	5
2.4.6 Follow Up Auditing	6
2.4.7 Exit Briefing	6
2.5 Audit Consultation	6
2.6 Compliance Status Descriptors	6
3. AUDIT FINDINGS	8
3.1 Approval and Document List	8
3.2 Compliance Performance	8
3.3 Summary of Agency Notices and Orders	8
3.4 Actions from Previous Audit	8
3.5 Non-Compliances During the Audit Period	8
3.6 Environmental Performance	13
3.6.1 Site Inspection Summary	13
3.6.2 Environmental Management Documents	14
3.6.3 Waste Management	14
3.6.4 Erosion and Sediment Control	15
3.6.5 Water Management	15
3.6.6 Operation of Plant and Equipment	15
3.6.7 Air Quality	16
3.6.8 Aboriginal Heritage	16
3.6.9 Environmental Incidents	16
3.6.10 Environmental Complaints	17
3.6.11 Environmental Impact Comparison	17
4. RECOMMENDATIONS	19

TABLES

Table 1 SSD 8889679 IEA Requirements 2

Table 2 Feedback from Regulatory Consultation 6

Table 3 Summary of Compliance..... 8

Table 4 Status of Actions Arising from Previous IEA 9

Table 5 IEA Non-Compliances13

Table 6 IEA Recommendations 19

FIGURES

Figure 1 SSD 8889679 Project Layout..... 3

APPENDICES

Appendix A Endorsement of IEA Team

Appendix B IEA Declaration

Appendix C IEA Compliance Tables

Appendix D Stakeholder Engagement Correspondence

Appendix E IEA Site Visit Agenda

Appendix F Site Inspection Plates

1. INTRODUCTION

1.1 BACKGROUND

James Bailey & Associates (JBA) has been commissioned by AGL Macquarie Pty Limited (AGL) to conduct the third construction phase Independent Environmental Audit (IEA) for the Liddell Battery and Bayswater Ancillary Works Project (SSD 8889679).

AGL owns and operates the Bayswater Power Station (Bayswater), Liddell Power Station (Liddell), Hunter Valley Gas Turbines and associated ancillary infrastructure systems. Liddell and Bayswater are located approximately 25 kilometres (km) north west of Singleton, 15 km south east of Muswellbrook and 165 km north west of Sydney. The Project is located within the Singleton and Muswellbrook Local Government Areas (LGAs) and located within an area dominated by mining and power generation.

State Significant Development (SSD) 8889679 provides for the following activities:

- Construction and operation of a Battery Energy Storage System with a capacity of up to 500 MW and 2 GWh;
- Decoupling works to facilitate the separation of the Bayswater Power Station from the Liddell Power Station; and
- Upgrades to ancillary infrastructure required for the ongoing operation of the Bayswater Power Station.

SSD 8889679 was approved subject to conditions on the 8 March 2022 by the Director Resources Assessments in accordance with Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). **Figure 1** shows the layout of the Project as approved under SSD 8889679.

The IEA has been conducted generally in accordance with the NSW DPIE 'Independent Audit Post Approval Requirements May 2020' (IEA Guidelines).

1.2 AUDIT TEAM

The IEA was completed by Dorian Walsh (Certified Auditor Certificate Number: 201881) and Tegan Brown of JBA. No specialist sub-consultants were required to assist with the IEA.

A copy of the Department of Planning and Environment (now DPHI) endorsement of the IEA team is included in **Appendix A**. The Independent Environmental Audit Report Declaration for this IEA is included as **Appendix B**.

1.3 AUDIT OBJECTIVES

The IEA assesses AGL's activities during the audit period (see **Section 1.5**) and compliance with key regulatory approvals for the Project. The IEA assessed the status of conditions and commitments from:

- SSD 8889679; and
- SSD 8889679 management plans, strategies and programs.

1.4 AUDIT SCOPE

The IEA scope is defined under Schedule 2, Conditions C13 - 18 of SSD 8889679 which is reproduced below in **Table 1**.

1.5 AUDIT PERIOD

The IEA covers the period from 5 July 2023 to 16 January 2024, the date of the audit site visit (the audit period).

Table 1 SSD 8889679 IEA Requirements

Condition	Requirement	Report Section
Schedule 2 Condition C13	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020, or its latest version).	This IEA report
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.	Section 1.2 and Appendix A
Schedule 2 Condition C15	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020, or its latest version), upon giving at least 4 weeks' notice (or timing) to the Applicant of the date upon which the audit must be commenced.	N/A; No requests made by DPHI to change IEA frequency
Schedule 2 Condition C16	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020, or its latest version), the Applicant must:	Note only
Schedule 2 Condition C16 (a)	review and respond to each Independent Audit Report prepared under condition C13 of this approval, or condition C15 where notice is given by the Planning Secretary;	This IEA report; AGL to complete response to DPHI
Schedule 2 Condition C16 (b)	submit the response to the Planning Secretary; and	N/A; AGL to complete
Schedule 2 Condition C16 (c)	make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	N/A; AGL to complete
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.	N/A; AGL to complete
Schedule 2 Condition C18	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	N/A

Figure 1 SSD 8889679 Project Layout



2. AUDIT METHODOLOGY

2.1 OVERVIEW

This IEA was undertaken in accordance with the requirements of SSD 8889679 (see **Section 1.4**) and the IEA Guidelines. **Appendix A** includes a copy of DPHI endorsement for the IEA team (see **Section 1.2**) and confirmation over audit requirements.

The compliance status of AGL activities during the audit period was determined by assessment of key approval documents regulating site activities (see **Section 3.1**) and a desktop review of all plans, strategies, programs, monitoring data and correspondence relevant to the audit period. The desktop review was used as a basis for this IEA report and identified potential compliance issues that were verified during the Project site inspection and in interviews with key AGL personnel.

The audit methodology also included consultation with NSW DPHI, Environment Protection Authority (EPA), Muswellbrook Shire Council (MSC) and Singleton Council to seek any specific environmental issues that should be a focus of the IEA (see **Section 2.5**).

2.2 IEA PREPARATION

Preparation of the IEA involved:

- Submission of an information request to AGL for the provision of evidence to verify the compliance status of AGL Project activities during the audit period;
- Engagement with key regulatory agencies for the Project regarding any specific issues that should be a particular focus of the IEA;
- Submission of an audit agenda to AGL (see **Appendix E**) and confirmation over the scope of the site inspection component of the IEA;
- Desktop review of documentation provided by AGL to determine the compliance status of approval and licencing conditions, identify good site practice and opportunities for improvement, in accordance with the requirements of the IEA Guidelines; and
- Preparation of compliance tables and protocols for the site inspection, including a checklist of specific regulatory requirements obtained from documents provided.

2.3 COMPLIANCE EVALUATION

The IEA consisted of a detailed desktop review of approval documentation and a site inspection. The findings of this IEA were based on verifiable evidence collected by:

- Review of documentation provided by AGL (including document reference, revision numbers, dates and authors);
- Interviews with key site personnel; and
- Inspection of the Liddell Battery and Bayswater Ancillary Works site, activities and processes on 16 January 2024. It is noted that only Stage 1 (Liddell Decoupler Transformer Year) and Stage 2 (solar array demolition works) of the Project had commenced at the time of audit, with selected images taken during the site inspection included as **Appendix F**.

Hardiksinh Chavda was the primary contact for the audit and was present during the audit site inspection.

A list of the key documentation reviewed for the IEA is found in **Section 3.1**. The evidence that was used to determine the compliance status with respect to each condition has been documented in the tables provided in **Appendix C**, along with relevant observations, notes and recommended opportunities for improvement.

2.4 SITE INSPECTION

A physical site inspection of SSD 8889679 Stage 1 and Stage 2 development sites was conducted on 16 January 2024 and undertaken to ensure that all aspects of environmental management and performance of the Project were reviewed.

At the time of audit, AGL had:

- Completed construction of the Transformer Yard for the Liddell Power Station Decoupling Works (SSD 8889679 Stage 1); and
- Commenced demolition of the existing solar array site which is required prior to the development the Battery Energy Storage System (BESS) (SSD 8889679 Stage 2).

Development of the other activities approved under SSD 8889679 had not commenced during the audit period.

2.4.1 Opening Meeting

The IEA site inspection commenced with an opening meeting; attendees included Dorian Walsh (JBA), Tegan Brown (JBA), Hardiksinh Chavda (AGL), and Keith Simkin (AGL). The briefing included clarification of the audit objectives, scope, resources required and the methodology of the IEA.

2.4.2 Site Overview and Orientation Session

An orientation session was conducted by AGL site personnel to provide JBA with a general overview of the Project during the audit period, an indication of the environmental setting, near neighbours, safety and emergency requirements and known environmental issues.

2.4.3 IEA Interviews

The IEA included interviews with key AGL and AGL contract personnel involved with the management and operation of the Project. The IEA interviews during the site inspection were conducted to assist with verifying the compliance status of the Project. AGL and Project personnel interviewed as part of the IEA included:

- Hardiksinh Chavda (AGL Environment Advisor); and
- Bill Henderson (Site Co-ordinator, HV Decoupling Project); and
- Keith Simkin (Advisor Environment (Contractor)).

2.4.4 Focused Site Inspection

A focused site inspection was conducted following the initial site overview and opening meeting. The purpose of the site inspection was to review specific operation and environmental aspects of the Project and to assess AGL environmental management systems and performance in detail.

2.4.5 Site Documentation Review

Relevant site documentation was reviewed with AGL personnel during the site inspection interviews to verify compliance. Key documents reviewed included SSD 8889679, monitoring results, correspondence with regulatory agencies, Environmental Management Plans and procedures.

2.4.6 Follow Up Auditing

Follow up interviews and document reviews were conducted to clarify any outstanding compliance issues to be resolved prior to inclusion in the final IEA report.

2.4.7 Exit Briefing

An exit briefing was conducted prior to JBA departure from the site. Attendees of exit briefing included Dorian Walsh, Tegan Brown, and Hardiksinh Chavda. The exit meeting included findings of the preliminary audit, recommendations and explanation of actions required by AGL and by JBA to complete the audit process required under the IEA Guidelines.

2.5 AUDIT CONSULTATION

Correspondence was sent to the DPHI, EPA, MSC and Singleton Council requesting their input into the scope of the IEA. Responses were received from MSC and EPA (see **Appendix D**), with comments provided in **Table 2**.

2.6 COMPLIANCE STATUS DESCRIPTORS

The compliance status of each condition reviewed during the IEA was assessed based on evidence provided and determined in accordance with the descriptors provided in the IEA Guidelines. No other terms have been used to describe the compliance status of conditions within this IEA.

Table 2 Feedback from Regulatory Consultation

Comment	Response
Muswellbrook Shire Council	
The previous two IEA Reports are quite comprehensive, as such, please find minor comments following.: Could you review water management, erosion / sediment control and waste management (including waste classification). Staff are particularly interested in how AGL are tracking against the recommendations made in the Stage 2 IEA in relation to waste management.	Comments on water management, erosion / sediment controls and waste management are discussed in Section 3 . Non-compliances and recommendations are included in Table 5 and Table 6 .
Please also include a review of Aboriginal Heritage, where relevant for Stage 3.	Comments on Aboriginal Heritage are included in Section 3.6.8 .
Could you request AGL update the 'Independent Audit Response Letter' on its website, to indicate which IEA the response is for.	See Section 4 . A recommendation has been made for AGLM to update their website to specify the audits that each response applies to.
EPA	
Thank you for the request on 17 January 2024 requesting input from the NSW Environment Protection Authority (EPA) on the Independent Environmental Audit of the Liddell Battery and Ancillary Works Project (SSD-8889679). The EPA encourages the preparation and implementation of audits, strategies, programs and plans. They are useful tools for industry to determine how they will meet their statutory obligations and designated environmental objectives. Being a regulatory authority, the EPA's role is to administer and regulate statutes for environmental	Note only.

Comment	Response
management and protection. As such the EPA does not directly get involved in the development of strategies or carrying out of audits to achieve those objectives and does not review or comment on such documents. Accordingly, the EPA offers no comments on the environmental audit.	

3. AUDIT FINDINGS

3.1 APPROVAL AND DOCUMENT LIST

AGL documentation for the IEA was sighted during a detailed desktop review and the audit site inspection of 16 January 2024. Approvals and documents assessed during the audit were related to:

- SSD 8889679 approval conditions;
- SSD 8889679 Statement of Commitments;
- SSD 8889679 environmental management plans and procedures;
- AGL environmental monitoring data;
- AGL correspondence with regulatory agencies and other records of consultation; and
- AGL response to the findings and recommendations in the previous IEA.

The tables included in **Appendix C** discuss the documentation that was used to determine compliance with the conditions of SSD 8889679 assessed during the IEA.

3.2 COMPLIANCE PERFORMANCE

Table 3 provides a summary of compliance for key AGL approvals and licensing during the audit period. A description of each identified non-compliance is provided in **Section 3.5** and **Appendix C**.

Table 3 Summary of Compliance

Document	C	NC	NT	Note	Total
SSD 8889679	32	4	28	5	69
SSD 8889679 Statement of Commitments	48	7	13	-	68

3.3 SUMMARY OF AGENCY NOTICES AND ORDERS

No notices, orders, penalty notices or prosecutions in relation to SSD 8889679 were issued to AGL during the audit period.

3.4 ACTIONS FROM PREVIOUS AUDIT

A summary of the actions arising from the previous SSD 8889679 IEA (JBA, August 2023) is provided in **Table 4**. Actions that have not been completed by AGL at the time of this audit have been retained in **Section 3.5** and **Section 4** below.

3.5 NON-COMPLIANCES DURING THE AUDIT PERIOD

Table 5 lists the non-compliances identified during the audit period. Recommendations made in relation to these non-compliances are provided in **Section 4**, with further context provided in **Appendix C**.

Table 4 Status of Actions Arising from Previous IEA

Ref	Previous IEA Findings	AGL Proposed Completion Date	2023 IEA Status
SSD 8889679 Non-Compliances & Recommendations			
Schedule 2, Condition A9	It is recommended that copies of construction and occupation certificates for the new project buildings and structures required for Stage 1 of the Project are obtained following the completion of construction.	N/A	Compliant. See Appendix C for further detail.
Schedule 2, Condition B26(b)	It is recommended that stockpile locations and dates of establishment for each stockpile are recorded in an updated ESCP.	N/A	Not Compliant. Additional recommendations are provided in Table 6 .
Schedule 2, Condition B26(b)	It is also recommended that erosion and sediment controls are maintained for the stockpile of material excavated from the Project construction area	Noted as completed in response to last audit	Not Compliant. Additional recommendations for erosion and sediment controls are provided in Table 6 .
Schedule 2, Conditions B27(b)	It is recommended that AGL ensure Project waste is recorded and classified generally in accordance with the EPA Waste Classification Guidelines.	N/A	Compliant. See Appendix C for further detail.
Schedule 2, Conditions B27(c)	It is recommended that AGL retains copies of records from the Project waste contractor for disposal of waste at licenced facilities located off site.	N/A	Compliant. See Appendix C for further detail.
Schedule 2, Condition C5	It is recommended that AGL notify DPE of the non-compliances identified in this audit report within seven days of the document date.	N/A	Compliant. See Appendix C for further detail.
Schedule 2, Condition C17	It is recommended that AGL submit this IEA report and their response to DPE as soon as possible following completion of this audit report.	N/A	Compliant. See Appendix C for further detail.
Schedule 2, Condition C1(d), Schedule 2, Condition C19(a)(vii), Schedule 2, Condition C19(b)	It is recommended that the complaints register for SSD 8889679 is updated on the AGL website each month, even in the event that no Project-specific complaints are received.	Completed	Compliant. See Appendix C for further detail.

Ref	Previous IEA Findings	AGL Proposed Completion Date	2023 IEA Status
Schedule 2, Condition C19(a)(viii), Schedule 2, Condition C19(b)	The AGL response to the previous IEA report (JBA, 2023) was not published on the website at the time of audit. It is recommended that this document is published.	31/08/2023	Compliant. See general improvement recommendation provided in Table 6 .
Schedule 2, Condition C19(a)	It is recommended that all 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.	N/A	Compliant. See general improvement recommendation provided in Table 6 .
Schedule 2, Condition D4	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.	Ongoing	Compliant. See general improvement recommendation described in Table 6 .
Schedule 2, Condition D6	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.	N/A	Compliant. See general improvement recommendation described in Table 6 .
SSD 8889679 EIS Commitments Non-Compliances and Recommendations			
HR2	It is recommended that AGL documents the design and selection process to ensure all electrical equipment considers EMF levels and complies with ICNIRP reference levels.	Ongoing	Compliant. See Appendix C for further detail.
HR6	It is recommended that all Project personnel will be trained in spill response, with training records retained.	Completed	Compliant. See Appendix C for further detail.
AQ2	It is recommended that AGL document the implementation of control measures for Project loading and unloading activities during construction.	As required	Not Compliant. See recommendation regarding loading and unloading activities in Table 6 .

Ref	Previous IEA Findings	AGL Proposed Completion Date	2023 IEA Status
AQ3	It is recommended that AGL retains evidence that regular inspection and removal of debris from plant and equipment prior to leaving site is occurring for the Project.	N/A	Compliant. See Appendix C for further detail.
AQ5	It is recommended that activities are coordinated between the Project and the WOAOW project team to limit the potential for cumulative dust impacts during future stages of the development where possible.	N/A	Not Triggered. See Appendix C for further detail.
TT3	It is recommended that 40 km/hr speed signage is reinstated for internal roads accessing the Project work area	N/A	Compliant. See Appendix C for further detail.
BIO5	It is recommended that material stockpiled during Stage 1 of the Project is delineated in the field.	N/A	Not Compliant. See recommendation for stockpile delineation in Table 6 .
BIO8	It is recommended that AGL ensures that where possible, machinery or personnel avoid entering areas of significant weed infestations during future stages of the Project.	Ongoing	Compliant. See Appendix C for further detail.
BIO10	It is recommended that during the clearing works for future stages of the Project, weeds will be disposed and managed appropriately to stop the spread of existing weed species and records are retained.	N/A	Not Compliant. See recommendations for weed management and disposal in Table 6 .
BIO11	It is recommended that AGL ensures vehicle and machinery hygiene measures are applied during construction works for future Stages of the Project.	N/A	Compliant. See Appendix C for further detail.
BIO12	It is recommended that documentation for future Stages of the Project is updated to include a protocol for construction vehicles driving to and from construction areas to prevent the spread or introduction pathogens on site.	N/A	Compliant. See Appendix C for further detail.

Ref	Previous IEA Findings	AGL Proposed Completion Date	2023 IEA Status
V1	It is recommended that AGL retain copies of detailed designs for future stages of the Project that confirms retention and enhancement of existing landscape features.	N/A	Compliant. See Appendix C for further detail.
V3	It is recommended that the consideration of non-reflective surfaces is documented in the design phase for the development of infrastructure in future stages of the Project.	N/A	Compliant. See general improvement recommendation in Table 6 .
V5	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.	N/A	Not Compliant. See recommendations for mitigation tree and shrub planting in Table 6 .
V6	It is recommended that AGL retains records of water used for Project dust suppression.	N/A	Compliant. See general improvement recommendation in Table 6 .
W3	It is recommended that erosion and sediment controls are maintained for the stockpile of material excavated from the Project construction area	Noted as completed	Non-compliant. See recommendations for erosion and sediment controls in Table 6 .
SE3	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.	N/A	Compliant. See Appendix C for further detail.
I2	It is recommended that AGLM document consultation with Ausgrid regarding continued supply.	N/A	Compliant. See Appendix C for further detail.
CL1	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.	N/A	Not Triggered. See Appendix C for further detail.

Table 5 IEA Non-Compliances

Ref	Non-Compliance
SSD 8889679	
Schedule 2, Condition A2	Non-compliances (NC) with SSD 8889679 conditions were identified during this IEA as described below and in Appendix C .
Schedule 2, Condition B15(c)	Some areas of exposed surfaces on stockpiles and exposed contour banks surrounding the completed Stage 1 facilities were observed during the site inspection
Schedule 2, Condition B26(b)	An Erosion and Sediment Control Plan (ESCP) documenting stockpile locations for the Project was not in place at the time of audit, as required under Section 5.1 of the Soil and Water Management Plan.
Schedule 2, Condition C1(e)(iii)	The Stage 1 EMS does not include a clear plan depicting the locations of monitoring to be carried out under the conditions of SSD 8889679.
SSD 8889679 EIS Commitments	
HR5	Evidence was not available at the time of audit to confirm a designated refuelling area and procedures had been established for Stage 2 works.
AQ2	Evidence was not available at the time of the audit to confirm dust mitigation controls were implemented during the loading and unloading of materials during Stage 2.
AQ6	During the site inspection a Stage 1 project stockpile was sighted that was not cover cropped.
BIO5	A stockpile established for Stage 1 has not been delineated in the field.
BIO10	Evidence of weed disposal and management was not available at the time of the audit for Stage 1. 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.
BIO15	An exposed stockpile and small areas of exposed contour banks were observed around the completed Stage 1 facility during the site inspection.
W3	Some Stage 1 erosion and sediment controls required maintenance at the time of the site inspection.

3.6 ENVIRONMENTAL PERFORMANCE

3.6.1 Site Inspection Summary

The site inspection of 16 January 2024 included a review of the site of the Stage 1 (Transformer Yard) and Stage 2 ('Area 2: Solar array Area') development sites, as shown on **Figure 1**. Development of other Stages of the

SSD 8889679 Project had not commenced during the audit period. Selected images taken during the site inspection are included as **Appendix F**.

Stage 1

The site inspection found that the construction of the Transformer Yard required for the Decoupling Works has been practically completed and is being maintained well. Residual waste generated from the Project construction has been collected in separate skip bins for removal from site. Waste management for the Project is further described in **Section 3.6.3**. Erosion and sediment controls in place to manage runoff from disturbed

areas were found to be being implemented generally in accordance with the approved Project plans, with the exception of a stockpile area established during the previous audit period (see **Section 3.5**).

Chemicals being used for the Project were observed to be stored in appropriate bunded areas within the site laydown area at the time of audit, with suitable equipment to respond to any spills also available and signposted for use by Project personnel. This included portable fire extinguishers and fire blankets which are tagged six monthly and availability of a watercart and/or water trailer during the audit period.

Stage 2

The site inspection also found that the BESS site is being maintained well, with clear delineation of project work areas in the field. The site inspection confirmed that erosion and sediment controls were in place to manage runoff from the site, however recommendations for improvement have been made by JBA and included in **Table 6**.

During the site inspection it was confirmed that the area had been hydromulched and that there was low dust emissions on the day of the inspection (see **Section 3.6.7**).

3.6.2 Environmental Management Documents

The adequacy of AGL environmental management documents for the Project and the implementation of these plans was reviewed as a component of this IEA. In general, the review of the environmental management documentation found that AGL is operating in accordance with the environmental procedures and systems required under SSD 8889679.

Stage 1

Management plans reviewed for Stage 1 included the approved SSD 8889679 Environmental Management Strategy (EMS) and sub-plans, Aboriginal Cultural Heritage Management Plan (ACHMP), Air Quality Management Plan (AQMP), Construction Noise Management Plan, Contamination Management Plan, Soil and Water Management Plan, Traffic Management Plan and Waste Management Plan.

Stage 2

Management Plans reviewed for Stage 2 included the approved BESS EMS, Soil and Water Management Sub Plan, Noise Management Sub Plan, Air Quality Management Sub Plan, Contamination Management Sub Plan, Waste Management Sub Plan and Traffic Management Sub Plan,

Non-compliances identified in relation to Project management plans are listed in **Table 5**.

3.6.3 Waste Management

Schedule 2, Condition C1 (e) of SSD 8889679 requires AGL to prepare an EMS including a waste management subplan. The desktop review confirmed that a Stage 1 and Stage 2 Waste Management Plan has been prepared and approved by the DPHI. The Waste Management Plans identify the key waste issues that require control to manage Project waste impacts.

Stage 1

Segregated skip bins were sighted at the time of the site inspection for Stage 1 general waste.

Stage 2

The site inspection confirmed that all Stage 2 waste and excess materials are being contained within the designated boundaries of the Project construction area. A number of stockpiles were identified during the site inspection for Stage 2. It is noted that a stockpile potentially contaminated with asbestos material was under investigation by AGLM at the time of the audit, in accordance with site procedures.

3.6.4 Erosion and Sediment Control

The site inspection confirmed that erosion and sediment controls are generally in place at the Stage 1 and Stage 2 sites.

Stage 1

The site inspection at the Stage 1 area confirmed that sediment fencing around the residual topsoil stockpile requires maintenance, a recommendation for this has been included in **Table 6**.

Stage 2

Discussions with key AGLM personnel confirmed that sediment fences were in place for Stage 2 of the Project and that any sediment run off following a significant rain event would be captured in Lake Liddell. The audit site inspection for verified that sediment fencing has been installed around the areas where demolition works required for Stage 2 had taken place.

3.6.5 Water Management

Stage 1

The desktop review confirmed that a Water Management Plan has been developed and approved for Stage 1 of the Project. Conversations with key AGLM personnel confirmed that any sediment water from the Stage 1 construction area is captured in the existing Liddell site water management system. The Stage 1 site inspection confirmed that sediment and erosion controls are generally in place for the Project laydown and construction areas. Records of water used for dust suppression were not available at the time of the audit, a recommendation has been made and included in **Table 6**.

Stage 2

The desktop review also confirmed that there has been a Water Management Sub Plan developed for Stage 2 of the Project. The plan notes that the Stage 2 project is not located in a flood prone area and that the footprint would be located on land that is above the maximum water level of Lake Liddell and away from drainage lines.

3.6.6 Operation of Plant and Equipment

Schedule 2, Condition A12 of SSD 8889679 requires all plant and equipment used on site, or in connection with the development, to be maintained in a proper and efficient condition and operated in a proper and efficient manner.

Stage 1

The desktop review confirmed that daily pre-start inspections are being completed on plant and equipment associated with Stage 1 of the Project. The desktop review and interviews with key AGL personnel also confirmed that contractors working on Stage 1 of the Project complete site inductions which cover safe operation of plant and equipment. The desktop review also confirmed that SWMS are being completed for Stage 1 project related jobs.

Stage 2

The desktop review and interviews with key AGL personnel also confirmed that contractors working on Stage 2 of the Project complete site inductions which cover safe operation of plant and equipment. The desktop review also confirmed that SWMS are being completed for Stage 2 project related jobs. Maintenance reports were also available recording scheduled services for plant associated with Stage 2 of the Project.

3.6.7 Air Quality

Stage 1

The desktop review confirmed that AGL has prepared an AQMP for Stage 1 to identify the potential impacts of the Project construction and detail the controls to be implemented to minimise construction air quality impacts.

No air quality issues were identified at the Stage 1 site during the IEA. No elevated dust was observed from material stockpiled within the Stage 1 project construction area; however recommendations for cover cropping have been made for improved Stage 1 stockpile management, see **Table 6**.

No offensive odours were detected on the Stage 1 site during the IEA site inspection.

Discussions with AGL key personnel confirmed that no complaints have been received during the audit period in relation to air quality impacts from Stage 1 Project construction works.

Stage 2

An Air Quality Management Sub Plan has been developed for Stage 2 of the Project.

No air quality issues were identified at the Stage 2 site during the IEA. No elevated dust was observed from material stockpiled within the Stage 2 project construction area. During the site inspection it was confirmed that the site had been seeded and that there was good vegetation coverage, which is minimising exposed areas, see **Appendix F**.

No offensive odours were detected on the Stage 2 site during the IEA site inspection.

Discussions with AGL key personnel confirmed that no complaints have been received during the audit period in relation to air quality impacts from Stage 2 Project construction works.

3.6.8 Aboriginal Heritage

Stage 1

The desktop review confirmed that AGL has developed an ACHMP for the Decoupling Works component of the Project, which has been approved by the DPHI. The ACHMP was prepared in consultation with Heritage NSW and Registered Aboriginal Parties (RAPs), as required under Schedule 1, Condition B22 of SSD 8889679.

The ACHMP has been developed to provide protocols to assist AGL personnel and on-site contractors in managing the identified Aboriginal heritage values of the ACHMP area. Interviews with key AGL personnel and the site inspection confirmed that the boundary of SSD 8889679 construction works remains flagged in the field to prevent any disturbance outside the approved Project footprint. During the site inspection for Stage 1 boundary delineation with the use of flagging was sighted.

Section 3 of the ACHMP describes management of Aboriginal cultural heritage values including unanticipated finds protocols for Aboriginal objects, places and human skeletal remains. Discussions with key AGL personnel confirmed that there have been no unexpected finds of heritage items during the audit period.

Stage 2

The desktop review confirmed that an ACHMP has been developed and approved by DPHI for Stage 2 of the Project. The Stage 2 ACHMP was prepared in consultation with Heritage NSW and RAPs. Discussions with key AGL personnel confirmed that there have been no unexpected finds of heritage items during the audit period for Stage 2 of the Project.

3.6.9 Environmental Incidents

No environmental incidents requiring notification to regulatory agencies were recorded during the audit period for Stage 1 or Stage 2.

3.6.10 Environmental Complaints

Discussions with AGL employees found that no community complaints were received regarding Stage 1 or Stage 2 Project activities during the audit period.

3.6.11 Environmental Impact Comparison

Stage 1

A desktop review of the Environmental Impact Statement (EIS) prepared to support SSD 8889679 was completed as part of the IEA to compare AGL documentation and monitoring data for the audit period. A comparison with observed impacts was also undertaken during the site inspection, which found that the site project has been operating generally in accordance with the conditions of SSD 8889679.

The Project EIS noted that during the construction phase of the Project, the primary air quality risk would be dust generated from site clearing, materials excavation, handling, transport and placement, as well as from wind erosion of stored materials and exposed surfaces resulting in impacts at surrounding sensitive receivers. The desktop review and site inspection confirmed that adequate mitigation measures have been put in place to minimise the risks of dust emissions. Recommendations for further improvement opportunities for Stage 1 have been made in **Table 6**.

The EIS also noted that construction would require the use of heavy machinery, which can generate high noise and vibration levels at nearby receivers. The desktop review confirmed that a Construction Noise Management Plan has been developed and implemented by AGL for Stage 1. Discussions with key AGL personnel confirmed that the Decoupling Works completed during the audit period are only completed during approved operation hours and that all plant and equipment for the Project are regularly maintained and operated by appropriately qualified personnel.

It is noted within the Project EIS that two asbestos samples were associated with the existing ash pipeline. AGL have confirmed that the Decoupling Works would have minimal interaction with the ash pipeline and that the risk of disturbance of known areas of contamination is considered unlikely for the current stage of the Project. However, the EIS noted that occupational hygiene controls will be implemented as a precaution to mitigate potential construction worker exposure to asbestos. The desktop review confirmed that AGL have developed and implemented Contamination Management Plan for the Project as a sub-plan to the Project EMS. AGL also operate under a site-wide Asbestos Management Procedure which outlines responsibilities, procedures / protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos. Discussions with key AGL personnel confirmed that no asbestos has been identified during the audit period for Stage 1.

The EIS also notes that during construction, the majority of the Project components are largely screened by existing vegetation and topography and are typical of existing infrastructure from publicly accessible locations. Therefore visual impacts during construction would be limited to AGLM personnel and contractors, and construction personnel. The EIS describes construction visual impacts as clearing of vegetation and stockpiling of debris from construction activities. Discussions with key AGL personnel confirmed that no clearing of vegetation has occurred during the audit period for Stage 1. The site inspection confirmed that the visual appearance of the Stage 1 project blends in as far as possible with the surrounding landscape.

The EIS describes standard construction waste as an expected impact due to Decoupling Works, including spoil from cut and fill activities, green waste from clearing activities, general construction waste and sewage. The desktop review confirmed that a Stage 1 Waste Management Plan has been developed for the Project. Discussions with key AGL personnel confirmed that waste is managed under contract and disposed of appropriately at a licenced waste facilities. The site inspection confirmed that waste streams generated during Stage 1 Project construction activities are being segregated into separate skip bins, see **Appendix F**.

The potential impacts to water quality and hydrology listed within the EIS as a result of construction activities include removal of vegetation, general earthworks, including stripping of topsoil and excavation, stockpiling of topsoil and vegetation leading to the discharge of sediment-laden water, transportation of cut and/or fill materials and the movement of heavy vehicles across exposed earth, potential for spills, concreting works

resulting in concrete dust, concrete slurries or washout water entering downstream waterways. The site inspections for Stage 1 confirmed that mitigation measures have been put in place for Project construction areas, however regular inspection and maintenance of sediment controls has been recommended as an improvement opportunity (see **Table 6**).

The review of SSD 8889679 EIS commitments completed for this IEA is detailed in **Appendix C**.

Stage 2

The Project EIS noted that during the construction phase of the Project, the primary air quality risk would be dust generated from site clearing, materials excavation, handling, transport, and placement, as well as from wind erosion of stored materials and exposed surfaces resulting in impacts at surrounding sensitive receivers. The desktop review and site inspection confirmed that adequate mitigation measures have been put in place to minimise the risks of dust emissions. It was identified during the site inspection that the site had been seeded and vegetation coverage successful in reducing exposed areas.

The EIS also noted that construction would require the use of heavy machinery, which can generate high noise and vibration levels at nearby receivers. Discussions with key AGL personnel confirmed that the Stage 2 works are only completed during approved operation hours and that all plant and equipment for the Project are regularly maintained and operated by appropriately qualified personnel. Maintenance records for plant and equipment associated with Stage 2 of the Project were sighted during the desktop review as described in **Appendix C**.

The EIS notes that special waste including asbestos waste is a likely waste stream resulting from the Project. The desktop review confirmed that Kleinfelder was engaged by AGLM to undertake waste classification and validation assessment of the stockpiled and residual soils associated with Stage 2 that may be contaminated. Asbestos was identified within two samples, this included samples from a piece of asbestos cement sheeting and a collection of lagging-like material.

The EIS also notes that that during construction, the majority of the Project components are largely screened by existing vegetation and topography and are typical of existing infrastructure from publicly accessible locations. Therefore visual impacts during construction would be limited to AGLM personnel and contractors, and construction personnel. The site inspection confirmed that Stage 2 works at the time of the audit are limited in scale, with minimal views available from public roads. Recommendations in relation to visual mitigations have been made in **Table 6**.

The review of SSD 8889679 EIS commitments completed for this IEA is detailed in **Appendix C**.

4. RECOMMENDATIONS

A summary of the non-compliances with AGL approvals identified during the audit period is provided in **Table 5**. Recommendations made to respond to these non-compliances, as well as opportunities identified to improve AGL's general environmental performance, are provided in **Table 6**.

Table 6 IEA Recommendations

Ref	Recommendation Description
SSD 8889679	
Schedule 2, Condition B15	It is recommended that AGLM complete retreatment of the residual exposed areas of Stage 1 where the initial cover crop seeding was not successful, to minimise exposed areas that could result in dust generation as far as practicable.
Schedule 2, Condition B25, Condition B26	It is recommended that erosion and sediment controls around the Stage 1 stockpile are reinstated.
Schedule 2, Condition B26	It is recommended that stockpile locations and dates of establishment for each stockpile are recorded in an updated ESCP for Stage 1.
Schedule 2, Condition C1	It is recommended that the Stage 1 and Stage 2 EMS documents are reviewed and updated to include plan(s) showing the locations of monitoring to be carried out under the conditions of SSD 8889679.
Schedule 2, Condition C8	It is recommended that AGLM implement a process to ensure that Compliance Reports are prepared for the Project in accordance with DPE (2020) <i>Compliance Reporting Post Approval Requirements</i> .
Schedule 2, Condition C17	It is recommended that the AGLM response to the findings of this IEA provides comment on all identified non-compliances and improvement recommendations.
Schedule 2, Condition C19	It is recommended that responses to IEA reports available on the AGLM website indicate which audit they relate to.
Schedule 2, Condition D3	It is recommended that AGLM retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.
Schedule 2, Condition D4	It is recommended that AGLM 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.
Schedule 2, Condition D6	It is recommended that AGLM 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.

Ref	Recommendation Description
SSD 8889679 EIS Commitments	
HR5	It is recommended that a refuelling area for Stage 2 is delineated and communicated to the Project contractor.
AQ2	It is recommended that AGLM document the implementation of control measures for Project Stage 2 loading and unloading activities.
AQ6, BIO15, V5	It is recommended that exposed surfaces on stockpiles no longer required for Stage 1 construction are reseeded where previous treatment was not successful, to minimise exposed areas as far as practicable.
BIO5	It is recommended that material stockpiled during Stage 1 of the Project is delineated in the field and the location recorded.
BIO10	It is recommended that during the clearing works for future stages of the Project, weeds will be disposed of and managed appropriately to stop the spread of existing weed species and records are retained. Areas of weed infestation (primarily galenia and other exotics) were observed within the Stage 2 footprint. It is recommended that treatment of these areas is undertaken and monitored, with evidence of weed treatment and disposal retained.
V3	It is recommended that the consideration of non-reflective surfaces is documented in the design phase for the development of infrastructure for Stage 2 and future elements of the Project.
V5	It is recommended that AGLM consider the need for mitigation tree and shrub planting for Stage 1 to visually integrate the Project within the surrounding landscape and document the findings of this review. It is recommended that AGML complete a review of the full footprint and extent of Stage 2 facilities to confirm whether additional mitigation plantings will be required in future.
V6	It is recommended that AGLM retains records of water used for Project dust suppression.
WR02	It is recommended that all cleared vegetation is either mulched onsite for reuse or used to create habitat piles, with weeds and pathogens managed according to requirements under the NSW <i>Biosecurity Act 2015</i> .
W3	It is recommended that regular inspections and maintenance are completed on all Stage 1 erosion and sediment controls prior to disturbed areas being stabilised with vegetation cover.
W4	It is recommended that Project erosion and sediment controls are regularly inspected and maintained if required.
SE1	It is recommended that updates on the Project are provided via the AGLM website and that community dialogue meeting minutes are available.
SE2	It is recommended that evidence is retained to confirm the use of local suppliers, labour and businesses in the provision of goods and services is considered in the tender process for future construction phases of the Project.
CL1	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 EMS.

APPENDIX A

ENDORSEMENT OF IEA TEAM

Our ref: SSD-8889679-PA-35

James McNamara
Senior Environment Advisor
AGL Macquarie Pty Limited
Wonnarua Country
New England Highway
Muswellbrook NSW 2333

12/01/2024

Sent via the Major Projects Portal only

Subject: Liddell Battery and Bayswater Ancillary Works - Independent Environmental Auditor proposal

Dear Mr McNamara

I refer to your letter, SSD-8889679-PA-35, requesting the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Liddell Battery and Bayswater Ancillary Works, submitted as required by Schedule 2, Condition C14 of SSD-8889679 (the consent) to the then NSW Department of Planning and Environment (NSW Planning) on 11 December 2023.

NSW Planning has reviewed the auditor nominations and based on the information you have provided is satisfied that the proposed audit team is suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition C14 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team to undertake independent environmental audits for the pre-construction and construction phases of the development while they remain independent of the development:

- Dorian Walsh, Lead Auditor
- Tegan Brown, Assisting Auditor

Any additional or alternate auditors or audit team members must be agreed to by the Planning Secretary in separate correspondence.

Please ensure this correspondence is appended to all future audit reports.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Should you wish to discuss the matter further, please contact me on 0400 245 170 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "J Sage".

Jennifer Sage

A/Team Leader Northern

Compliance

As nominee of the Planning Secretary

APPENDIX B

IEA DECLARATION

Independent Environmental Audit Report Declaration	
Project Name:	Bayswater Power Station, Liddell Power Station
Consent No.:	SSD 8889679
Description of Project:	Liddell Battery and Bayswater Ancillary Works (SSD 8889679)
Project Address:	Off New England Highway, Muswellbrook NSW 2333
Proponent	AGL Macquarie Pty Limited
Proponent Address:	Level 24, 200 George Street, Sydney NSW 2000
Title of Audit:	AGL Macquarie Independent Environmental Audit
Date:	11 April 2024
Declaration	I declare that I will undertake the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge: i. the audit will be undertaken in accordance with relevant condition(s) of consent and the <i>Independent Audit Compliance Requirements</i> (Department 2020); ii. the findings of the audit will be reported truthfully, accurately and completely; iii. I will exercise due diligence and professional judgement in conducting the audit; iv. I will act professionally, objectively and in an unbiased manner; v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child; vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child; vii. neither I nor my employer have provided consultancy services for the audited project that is subject to this audit except as otherwise declared to the Department prior to the audit; and viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so. <u>Notes:</u> a) Under section 10.6 of the <i>Environmental Planning and Assessment Act 1979</i> a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and b) The <i>Crimes Act 1900</i> contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).
Name of Auditors:	Dorian Walsh Tegan Brown
Signature:	 
Auditor Qualification	Auditor for Environmental Management, EMS and Compliance Audits. Exemplar Global No. 201881
Company:	James Bailey & Associates
Company Address:	6/127-129 John Street, Singleton NSW 2330

APPENDIX C

IEA COMPLIANCE TABLES

Table C1 Project Approval SSD 8889679

Cond	Project Approval SSD 8889679	Status	Evidence
SCHEDULE 2: PART A - ADMINISTRATIVE CONDITIONS			
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT			
A1	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	C	A review of AGLM records and inspection of SSD 9990679 Project Stage 1 (Liddell Decoupler) and Stage 2 (BESS) project sites found that reasonable and feasible controls are in place to minimise the potential for material environmental impacts from site operations. Comments on AGLM environmental controls are provided under the relevant conditions below.
TERMS OF CONSENT			
A2	The development may only be carried out: (a) in compliance with the conditions of this consent	NC	Non-compliances (NC) with SSD 8889679 conditions were identified during this IEA. Findings and recommendations in relation to each non-compliance are provided against the relevant conditions below.
	(b) in accordance with all written directions of the Planning Secretary	C	HC (pers comms) confirmed that no written directions have been made by DPHI during the audit period.
	(c) generally in accordance with the EIS; and	C	A review of AGLM documentation found that the Project is being carried out generally in accordance with the EIS.
	(d) generally in accordance with the Development Layout.	C	The site layout is generally consistent with the general development layout shown in Appendix 1 of SSD 8889679.

Cond	Project Approval SSD 8889679	Status	Evidence
	Note: The general layout of the development is shown in Appendix 1.	NT	Note only.
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and	C	Directions from Department of Planning, Housing and infrastructure (DPHI, previously DPE) on documentation required under SSD 8889679 are noted against the relevant conditions below.
	(b) the implementation of any actions or measures contained in any such document referred to in paragraph (a).	NT	See Schedule 2, Condition A3(a) above. AGLM provided notification to DPE on 22 December 2023 that construction of Stage 1 of the Liddell Decoupling works had been completed.
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and the document/s listed in condition A2(b). In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition A2(b), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	NT	HC confirmed no inconsistencies were identified during the audit period.
SURRENDER OF EXISTING CONSENTS			
A5	At a time determined by the Secretary, being no later than 12 months after the date of commencement of development, or other timeframe agreed by the Planning Secretary in writing, the following development consents are to be surrendered in accordance with section 68 of the EP&A Regulation:	NT	HC noted that AGLM have commenced the process to surrender the required consents. HC (pers comms) confirmed that the date of surrender has been extended to the 15 of February 2024, in consultation with DPE. Sighted DPE email confirming that AGLM documents seeking to surrender the required consents were lodged on 22 September 2023.
	(a) 8/2016 (MSC)	NT	See Schedule 2, Condition A5 above.
	(b) 74/2018 (MSC)	NT	See Schedule 2, Condition A5 above.
	(c) 8.2018.273.1 (SC)	NT	See Schedule 2, Condition A5 above.
	(d) 8.2018.23.1 (SC)	NT	See Schedule 2, Condition A5 above.

Cond	Project Approval SSD 8889679	Status	Evidence
	(e) 8.2018.23.2	NT	See Schedule 2, Condition A5 above.
	(f) 54_86 (MSC)	NT	See Schedule 2, Condition A5 above.
	(g) 29_98 (SC)	NT	See Schedule 2, Condition A5 above.
	(h) 114_2016 (MSC)	NT	See Schedule 2, Condition A5 above.
	(i) 223_2004	NT	See Schedule 2, Condition A5 above.
	(j) 401_2000 (SC)	NT	See Schedule 2, Condition A5 above.
	(k) 460_2001 (SC)	NT	See Schedule 2, Condition A5 above.
	Note: Condition A5 does not extend to the surrender of construction or occupation certificates for existing and proposed building works under former Part 4A or Part 6 of the EP&A Act (as Part 6 applies from 1 September 2018). The surrender required by this condition A5 should not be understood to mean that works legally constructed under a valid consent or approval can no longer be legally maintained or used.	NT	Note only.
A6	Upon the date of commencement of development under this consent, and before the surrender of the existing development consents specified in condition 5, the conditions of this consent prevail to the extent of any inconsistency.	C	HC (pers comms) confirmed that the Project is operating under SSD 8889679 conditions.
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS			
A7	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);	C	Sighted AGLM Letter dated 12 August 2022 made publicly available on the AGLM website. The letter requests permission from the Planning Secretary to stage management plans for SSD 8889679 into Stage 1 (Decoupling Works) and Stage 2 (the Battery, Bayswater Ancillary Works and Consolidated Consents). Sighted copy of DPE letter dated 23 August 2022 approving the requested staging of management plans. All construction works completed during the audit period were related to Stage 1 (Decoupling Works) of the Project. The demolition works required to allow the

Cond	Project Approval SSD 8889679	Status	Evidence
			commencement of construction of Stage 2 had commenced during the audit period. HC (pers comms) confirmed that no further requests were made to DPE for the staging of Project documents during the audit period. Sighted correspondence from the DPHI referring to the AGLM letter dated 1 December 2022 and revised letter dated 25 January 2023, requesting approval for the staging of the Project Fire Safety Study. The letter notes that DPHI approves the proposed staging of the study.
	(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and	NT	HC (pers comms) confirmed that no Project strategy, plan or program has been combined.
	(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent. If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.		Stage 1 HC (pers comms) confirmed AGLM have updated several Project management plans and awaiting approval from DPHI at the time of audit. Stage 2 KS (pers comms) confirmed that all of the Stage 2 management plans are available on the AGLM website. It was noted that separate management documents will be retained for Stage 2.
NOTIFICATION OF COMMENCEMENT			
A8	A8. At least two weeks prior to the commencement of the following activities, the Applicant must notify the Department in writing of the date of:	C	Stage 1 Sighted copy of AGLM Notification of commencement of Stage 1 Decoupling Works letter to DPE, dated 12 August 2022. The letter notes that pre-construction

Cond	Project Approval SSD 8889679	Status	Evidence
			activities and physical works are scheduled to commence 1 September 2022. Stage 2 Sighted copy of AGLM SSD- 8889679: Notification of commencement of construction and request to defer Independent Environmental Audit dated 7 July 2023. The letter provides notification to the Department that construction of the battery energy storage system (BESS) for Stage 2 will commence on or soon after Monday 17 July 2023, with only demolition of existing infrastructure to be completed at this stage. The letter also seeks to provide further notification to DPE when construction work for the development of the BESS is to start. KS (pers comms) confirmed that Stage 2 works commenced with pre-clearing inspections completed on 14 September 2023. Also see Condition B7.
	(a) physical commencement of the development;	C	See Schedule 2, Condition A8 above.
	(b) pre-construction activities;	C	See Schedule 2, Condition A8 above.
	(c) construction of the battery energy storage system;	C	See Schedule 2, Condition A8 above.
	(d) construction of the decoupling works;	C	See Schedule 2, Condition A8 above.
	(e) construction of the Bayswater ancillary works; and	NT	HC (pers comms) confirmed that construction of the Bayswater ancillary works has not occurred within the audit period.
	(f) decommissioning.	NT	HC (pers comms) confirmed that decommissioning has not occurred within the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence
STRUCTURAL ADEQUACY			
A9	The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia.	C	Sighted copy of Certificate of Compliance dated 23 February 2023 and signed off by a Building Practitioner. The certificate notes that the LGS Wall/ Roof Frame Certification – Switchroom, Liddell Power Station complies with the provisions of the Regulations and the BCA. Sighted copy of Certificate of Compliance dated 17 February 2023 and signed off by a Building Practitioner. The certificate notes that the LGS Wall/ Roof Frame Certification – Switchroom, Liddell Power Station complies with the provisions of the Regulations and the BCA. Sighted Certificate of compliance dated 17 March 2023 that notes that the design described as LGS Wall/Roof Frame Certification – Switchroom, Liddell Power Station complies with the provisions of the Regulations and the BCA.
	Notes: Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development.	NT	See Schedule 2, Condition A9 above.
DEMOLITION			
A10	The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	C	Stage 1 HC (pers comms) confirmed that there has been no demolition works on site during the audit period for Stage 1. Sighted copy of email dated 23 January 2024 from the Site Coordinator of the HV Decoupling Project that notes that between the previous audit on the 4 July

Cond	Project Approval SSD 8889679	Status	Evidence
			2023 to Practical Completion in December there has been no demolition work performed on site, therefore this action has not been triggered. Stage 2 Sighted the following documents relating to Stage 2 demolition works during the audit period: - Email dated 18 January 2024 from CMA Contracting to AGML that notes the Work Method Statement for Stage 2 demolition works had been written in accordance with the requirements of the Australian Standards as well as the relevant Acts, Regulations and Codes of Practice; and - Screenshot of page 7 of WMS002-LPS Solar Farm Tower Demo-Rev1-101123 that references requirements for the work program, including the Australian Demolition Standard AS2601.
PROTECTION OF PUBLIC INFRASTRUCTURE			
A11	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and	NT	HC (pers comms) confirmed no issues for the Project have been identified.
	(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.	NT	See Schedule 2, Condition A11 (a) above.
OPERATION OF PLANT AND EQUIPMENT			
A12	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:	C	Stage 1 HC (pers comms) confirmed that plant and

Cond	Project Approval SSD 8889679	Status	Evidence
	(a) maintained in a proper and efficient condition; and		equipment used on site is serviced regularly. Viewed copy of Project Water Cart daily pre-start inspection dated 5 June 2023 which notes no critical faults found although left hand rear mudguard was loose. Sighted copy of Water Cart pre-start inspection dated 20 February 2023 which notes no critical faults. Sighted copy of FCS service report for plant serial number FCS 055 dated 7 February 2023. Stage 2 Sighted daily pre start operator daily plant inspection dated 13 November 2023. Sighted examples of Delta Group (Project Contractor) records for Stage 2 work, including: • Scheduled Maintenance Report dated 7 July 2023 for Plant No. 32436 which notes complete 1000 hour service; • Scheduled Maintenance Report dated 29 September 2023 for plant number 32445; and • Scheduled Maintenance Report dated 23 March 2023 for plant number 32435 which notes a 500 hour service was carried out.
	(b) operated in a proper and efficient manner.	C	Stage 1 Sighted copy of SWMS reference No. SWMS-15 which describes the job task of working at heights from an elevated work platform and notes that all equipment has

Cond	Project Approval SSD 8889679	Status	Evidence
			an AGLM introduction to site inspection and associated paperwork processed and all equipment fit for purpose inspected and rated. The SWMS also notes training and competencies required. SWMS has been signed off by individuals to acknowledge that they have read and understood the SWMS. Stage 2 KS (pers comms) confirmed that there is a Delta Group site induction to work within the Stage 2 work area. Sighted copy of SWMS dated 26 September 2023 'demolition of solar farm' prepared by Delta Group. Sighted copy of Delta Group Daily Site Pre-Start dated 3 November 2023 which that operator tickets and competency has been verified and plant register, inductions and pre-starts have been completed. Sighted copy of Delta Group SWMS for Demolition of Solar Farm dated 26 September 2023 which notes the control measures of use correct tool for task and pre check prior to use, relevant SOP reviewed prior to commencement, workers trained in how to use tools and competent to use.
SCHEDULE 2: PART B - GENERAL ENVIRONMENTAL CONDITIONS			
BATTERIES			
Battery Storage Restriction			
B1	The battery energy storage system or systems associated with the development must not exceed a total delivery capacity of 500 MW or a storage capacity of 2 GWh.	NT	HC (pers comms) confirmed that construction of the BESS had not

Cond	Project Approval SSD 8889679	Status	Evidence
	Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage system in the future.		commenced during the audit period (see Plate 17).
HAZARDS			
Fire Safety Study			
B2	B2. Prior to commencing construction of the battery energy storage system, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary. The study must: (a) be consistent with the: (i) Department's <i>Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline</i>; (ii) NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and	C	Sighted screenshot of Liddell Battery and Bayswater Ancillary Works – Notification of completion (Stage 1) reply from DPHI dated 25/01/24 which notes for Stage 2 of the Project, the Planning Secretary approved the Fire Safety Study be submitted 3 months prior to battery units arriving at the site, and the Emergency Plan to be submitted prior to the commission of BESS. Sighted letter from the Department referring to the AGLM letter dated 1 December 2022 and revised letter dated 25 January 2023. The DPHI letter approves the proposed staging of the fire study. KS (pers comms) confirmed that no batteries for Stage 2 have arrived on site.
	(b) describe the final design of the battery energy storage system and verify that the final design is consistent with all findings and recommendations in the Preliminary Hazard Analysis dated 25 March 2021.	NT	See Schedule 2, Condition B2(a) above.
B3	The Applicant must implement the measures described in the Fire Safety Study approved by the Planning Secretary.	NT	See Schedule 2, Condition B2(a) above.
Storage and Handling of Dangerous Goods			
B4	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and	C	Stage 1 The site inspection confirmed that only minor amounts of chemicals are stored on site following the completion of construction.

Cond	Project Approval SSD 8889679	Status	Evidence
			Sighted photo of 250L chemical storage cupboard and diesel storage unit used by PBE during the construction phase of Stage 1. Sighted AGLM internal email dated 23 January 2024 noting that specifications for the <i>Liddell Decoupling 3kV Switchyard Design Rec C</i> clearly indicates the sizing requirements of the bunds and notes that oil containment is to comply with AS2067. The email contains a copy of the supporting drawing 843264_02_05, which states that the required volume is 61,730 Litres whilst the bund capacity is approx. 78,141 Litres, which is 126%. Sighted copy of Navari designs for transformer placement which notes bund capacity of approximately 78,141 Litres. Stage 2 Sighted copy of demolition of Solar Farm SWMS dated 26 September 2023. The SWMS notes control measures for refuelling / fuelling and fuels and chemical storage during the initial demolition work for Stage 2.
	(b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. In the event of an inconsistency between the requirements (a) and (b) above, the most stringent requirement shall prevail to the extent of the inconsistency.	C	See Schedule 2, Condition B4(a) above.
Emergency Plan			
B5	Prior to commissioning the battery energy storage system, the Applicant must prepare a comprehensive Emergency Plan and detailed emergency procedures for the battery energy storage system in consultation with FRNSW and the NSW RFS.	NT	HC (pers comms) confirmed that commissioning of the BESS has not occurred during the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence
	(a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent);		
	(b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	NT	See Schedule 2, Condition B5 (a) above.
	(c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	NT	See Schedule 2, Condition B5 (a) above.
	(d) list works that should not be carried out during a total fire ban;	NT	See Schedule 2, Condition B5 (a) above.
	(e) include availability of fire suppression equipment, access, and water;	NT	See Schedule 2, Condition B5 (a) above.
	(f) include procedures for the storage and maintenance of any flammable materials;	NT	See Schedule 2, Condition B5 (a) above.
	(g) notification of the local RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation proposed to be carried out during a bushfire danger period to ensure whether conditions are appropriate	NT	See Schedule 2, Condition B5 (a) above.
	(h) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;	NT	See Schedule 2, Condition B5 (a) above.
	(i) include location of hazards (physical, chemical, and electrical) that may impact on firefighting operations and procedures to manage identified hazards during firefighting operations;	NT	See Schedule 2, Condition B5 (a) above.
	(j) include details of the location, management, and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone;	NT	See Schedule 2, Condition B5 (a) above.
	(k) include bushfire emergency management planning; and	NT	See Schedule 2, Condition B5 (a) above.
	(l) include details of the how RFS would be notified, and procedures that would be implemented, in the event that: (i) there is a fire on-site or in the vicinity of the site; (ii) there are any activities on site that would have the potential to ignite surrounding vegetation; or (iii) there are any proposed activities to be carried out during a bushfire danger period; and	NT	See Schedule 2, Condition B5 (a) above.
	(m) include details on how the battery storage facility and sub-systems can be safely isolated in an emergency.	NT	See Schedule 2, Condition B5 (a) above.
B6	The Applicant must implement the Emergency Plan for the duration of the development, provide a copy of the plan to the local Fire Control Centre and keep two copies of the plan on- site in a prominent	NT	See Schedule 2, Condition B5 (a) above.

Cond	Project Approval SSD 8889679	Status	Evidence
	position adjacent to the site entry point at all times.		
BIODIVERSITY			
Vegetation clearance			
B7	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	C	Stage 1 HC (pers comms) confirmed that construction works required to complete the decoupler work during the audit period did not require disturbance of native vegetation. Audit field inspections confirmed that additional disturbance of native vegetation had not been undertaken (see Plate 4 and Plate 10). Sighted copy of SSD8889679 Stage 1 Liddell Decoupling Works Completion letter dated 10 January 2024. The letter notes that AGLM wish to formally notify the Department of the successful completion of construction activities of Stage 1 Liddell Decoupling Works on 22 December 2023. Stage 2 Sighted copy of AGLM Ground and Vegetation Disturbance Approval (GVDA) Application Form dated 31 August 2023 for clearing of vegetation along the boundary at the proposed Liddell Battery Site (approximately 1.4km perimeter). Sighted copy of GVDA Application form dated 20 December 2023 for four test pits being excavated at and near the Battery Site. Sighted copy of GVDA Application form dated 20 December 2023 for the

Cond	Project Approval SSD 8889679	Status	Evidence
			installation of star pickets along 3 polylines and 1 polygon in order to install a temporary exclusion fence, consisting of star pickets and flagging tape. Sighted Solar Array Demolition Fauna Spotter Catcher Inspection dated 24 November 2023, completed by Kleinfelder. KS (pers comms) confirmed that the site boundary has been fully flagged by surveyors Tony Mexton & Associates. Sighted boundary flagging during site inspection, see Plate 11, Plate 12 and Plate 16. Clearing did not appear to extend beyond the boundary of the pre-construction work area required for the BESS.
Biodiversity Management Plan			
B8	Prior to commencement of native vegetation clearance, unless otherwise agreed by the Secretary, the Applicant must prepare a Biodiversity Management Plan to the satisfaction of the Secretary. This plan must: (a) be prepared by a suitably qualified and experienced biodiversity expert/s;	C	Stage 1 HC (pers comms) confirmed there has been no change since the previous audit for Stage 1. Sighted AGLM letter to DPE dated 12 August 2022. The letter requested consideration on Schedule 2, Condition B8 of SSD 8886979 and noted that the Biodiversity Management Plan is not required for Project Stage 1 (Decoupling Works) as the clearing of native vegetation is not required for this stage. The letter also notes that should native clearing be required for future stages a Biodiversity Management Plan will be prepared and submitted to the Department for review and approval.

Cond	Project Approval SSD 8889679	Status	Evidence
			Sighted DPE letter dated 23 August 2022 that approves the staging or Project plans and notes the Biodiversity Management Plan is not required for Stage 1 as no clearing of native vegetation is required. Stage 2 A Biodiversity Management Plan (BMP) for Stage 2 was approved by DPE letter dated 10 July 2023. Sighted copy of Site Safety Walk dated 18 October 2023 which includes inspection of site entrances to ensure they are clear, free of overgrowth and a clear line of sight is provided for vehicles existing site (see Plate 12). Sighted copy of Pre Mobilisation Weed, Seed and Pathogen Inspection dated 12 September 2023 for plant number 32273 which notes 470 excavator has been re-sprayed and is clear and free from soil, dirt and material.
	(b) be prepared in consultation with the BCS;	C	Sighted DPHI letter dated 10 July 2023 which notes that the Stage 2 BMP had been prepared in consultation with the Departments Biodiversity, Conservation and Science Directorate.
	(c) describe the short, medium and long-term measures to be undertaken to manage vegetation and fauna habitat on the site;	NT	See Schedule 2, Condition B8 (a) above.
	(d) describe measures to be implemented within the site to minimise: (i) the amount of clearing, including investigation of design options to minimise disturbance of native vegetation for the battery energy storage system and decoupling works; (ii) impacts on fauna, including undertaking pre-clearance surveys and maximising the salvage of resources for habitat enhancement;	NT	See Schedule 2, Condition B8 (a) above.

Cond	Project Approval SSD 8889679	Status	Evidence
	(iii) impacts on threatened flora and fauna species or ecological communities within the development footprint and its surrounds; (iv) the spread of weeds and fungal pathogens; (v) the generation and dispersion of sediment to watercourses; and (vi) light spill from night works; and		
	(e) include a program to monitor, evaluate and report on the effectiveness of the measures.	NT	See Schedule 2, Condition B8 (a) above.
B9	The Applicant must implement the Biodiversity Management Plan approved by the Planning Secretary.	NT	See Schedule 2, Condition B8 (a) above.
Biodiversity Offsets			
B10	The Applicant must retire the biodiversity credits for Offset Stages 1, 2 and 3 as specified in Table 1 below, prior to commencing vegetation clearing in those stages. The retirement of credits must be carried out in accordance with the Biodiversity Offsets Scheme of the BC Act.	C	Stage 1 Sighted Biodiversity Conservation Trust statement dated 28 April 2022 confirming payment into the Biodiversity Conservation Fund for an offset obligation for biodiversity credit type 10211 – <i>Delma impar</i> (Striped Legless Lizard) required for the Stage 1 of the Project. Stage 2 Viewed vegetation mapping prepared by Kleinfelder (April, 2023) for the SSD-24937520 EIS. KS (pers comms) confirmed that vegetation clearing for during the audit period has not triggered the requirement to retire Stage 2 biodiversity credits.
B11	The Applicant may review and update the ecosystem and species credit requirements in Table 1 to reflect the final construction footprint and resulting extent and type of plant community types to be cleared. Amendments to the ecosystem and species credit requirements must be undertaken in consultation with BCS and approved by the Planning Secretary prior to the commencement of construction of the relevant offset stage.	NT	HC (pers comms) confirmed that AGLM have not sought to review and update Project ecosystem credit requirements during the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence																																																																				
	Table 1: Ecosystem Credit Requirements¹ <table><tr><th rowspan="2">Vegetation Community^a</th><th colspan="4">Credits Required^a</th><th rowspan="2">Total^a</th></tr><tr><th>Stage 1^a</th><th>Stage 2^a</th><th>Stage 3^a</th><th>Stage 4^a</th></tr><tr><td colspan="5">Ecosystem credits^a</td></tr><tr><td>Narrow-leaved Ironbark¹ - Grey Box grassy woodland of the central and upper Hunter -¹ Moderate^a</td><td>-0</td><td>-0</td><td>-0</td><td>380</td><td>380</td></tr><tr><td>1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter -¹ Rehabilitation^a</td><td>-0</td><td>-0</td><td>340</td><td>1520</td><td>1860</td></tr><tr><td>1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter -¹ Native Grasslands^a</td><td>-0</td><td>210</td><td>00</td><td>10</td><td>220</td></tr><tr><td>1731 Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley -¹ Moderate-Good^a</td><td>-0</td><td>80</td><td>00</td><td>100</td><td>180</td></tr><tr><td>1692 Bull Oak grassy woodland of the central Hunter Valley -¹ Moderate-Good^a</td><td>-0</td><td>370</td><td>110</td><td>340</td><td>820</td></tr><tr><td>1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin¹ Bioregion - Moderate^a</td><td>-0</td><td>10</td><td>00</td><td>60</td><td>70</td></tr><tr><td colspan="5">Species credits^a</td></tr><tr><td>Southern myotis^a</td><td>-0</td><td>440</td><td>210</td><td>1310</td><td>1960</td></tr><tr><td>Striped legless lizard^a</td><td>10</td><td>310</td><td>270</td><td>2200</td><td>2790</td></tr></table>	Vegetation Community ^a	Credits Required ^a				Total ^a	Stage 1 ^a	Stage 2 ^a	Stage 3 ^a	Stage 4 ^a	Ecosystem credits ^a					Narrow-leaved Ironbark ¹ - Grey Box grassy woodland of the central and upper Hunter - ¹ Moderate ^a	-0	-0	-0	380	380	1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - ¹ Rehabilitation ^a	-0	-0	340	1520	1860	1691 Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - ¹ Native Grasslands ^a	-0	210	00	10	220	1731 Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley - ¹ Moderate-Good ^a	-0	80	00	100	180	1692 Bull Oak grassy woodland of the central Hunter Valley - ¹ Moderate-Good ^a	-0	370	110	340	820	1071 Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin ¹ Bioregion - Moderate ^a	-0	10	00	60	70	Species credits ^a					Southern myotis ^a	-0	440	210	1310	1960	Striped legless lizard ^a	10	310	270	2200	2790		
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	Notes: - To identify the surface disturbance areas associated with Offset Stages 1, 2, 3 and 4 in Table 1, refer to the Figure in Appendix 3. - The credits in Table 1 were calculated in accordance with Biodiversity Assessment Methodology (BAM) (DPIE, 2020). - The available credit retirement options for the development include purchase and retirement of open market available biodiversity credits, payment into the Biodiversity Conservation Fund or establishment of a Biodiversity Stewardship Site.	NT	Note only.																																																																				
AMENITY																																																																							

Cond	Project Approval SSD 8889679	Status	Evidence
Noise			
B12	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	C	Stage 1 HC (pers comms) confirmed that construction works for the Project are only completed during the standard work hours recommended within the <i>Interim Construction Noise Guideline</i>. Section 3.1 of the approved sub-plan Liddell Decoupling Works – Construction Noise Management Plan (NMP) dated 22 August 2022 (see Schedule 2, Condition C1) notes that Project construction works for Stage 1 are not predicted to exceed standard hours, evening hours, or night-time noise management levels. Sighted copy of sign in / sign out register job number: 62090 from the 1 – 2 November 2023. Sighted Jacobs <i>Decoupling Out of Hours Civil Construction Works Noise Assessment</i> dated 17 May 2023. The modelling assessment concluded that Project noise levels at all non-residential receivers would not exceed the Noise Management Levels during construction works thus condition B14 (a) could be met without the need for any specific additional controls. Stage 2 Sighted copy of Liddell Battery Solar Array Demolition Works – Noise Compliance Monitoring – October 2023. Section 1.3 of the document notes that all measurements were conducted in accordance with the specifications detailed in the <i>NSW DECC</i>

Cond	Project Approval SSD 8889679	Status	Evidence
			<i>Interim Construction Noise Guideline (2019).</i> No noise compliance issues were noted. Examples of the Stage 2 contractor sign in / sign out register were sighted on the day of the site inspection, confirming demolition works were being completed in daylight hours.
	(b) take all reasonable and feasible steps to minimise noise from construction and operational activities.	C	Stage 1 Sighted Liddell Decoupling Works – Construction Noise Management Plan dated 22 August 2022. Section 5.2 of the Noise Management Plan describes noise mitigation measures. HC (pers comms) confirmed that all plant and equipment for the Project are maintained and operated in accordance with manufacturers specifications. No plant or equipment was left idling during the site inspection. HC (pers comms) confirmed there has been no noise complaints during the audit period. Stage 2 Sighted a copy of the Liddell Power Station Battery Energy Storage System Construction Noise Management Sub Plan dated 16 July 2023. Section 7 of the plan describes noise management measures. KS (pers comms) confirmed that all plant and equipment for the Project are maintained and operated in accordance with manufacturers specifications. No plant or equipment was sighted idling during the site inspection.

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			KS (pers comms) confirmed there has been no noise complaints during the audit period.
Hours of construction			
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.	C	Stage 1 HC (pers comms) confirmed that construction work at the premises is conducted between the approved hours of Schedule 2, Condition B13. Sighted a copy of the PBE Site Management Plan, version B, dated October 2022. The Plan describes that decoupling works will be undertaken during standard construction hours defined as: • 7:00am to 6:00pm Monday to Friday inclusive; • 8:00am to 1:00pm on Saturday; and • At no time on Sunday or Public Holidays. A PBE sign in / sign out register dated 1-2 November 2023 was sighted for the Project during the site inspection which recorded arrival and departure times of personnel in accordance with approved Project construction hours. Stage 2 KS (pers comms) confirmed that construction work at the premises is conducted between the approved hours of Schedule 2, Condition B13. KS (pers comms) confirmed that a sign in / sign out register is used by employees and

Cond	Project Approval SSD 8889679	Status	Evidence
			contractors for Stage 2 which records arrival and departure times. Examples of the Stage 2 contractor sign in / sign out register were sighted on the day of the site inspection, confirming demolition works were being completed in daylight hours.
Exceptions to construction hours			
B14	The following activities may be carried out outside the recommended construction hours: (a) construction that causes LAeq (15minute) noise levels that are: (i) no more than 5 dB above Rating Background Level at any residence in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009); and (ii) no more than the Noise Management Levels specified in Table 3 of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) at other sensitive land uses; or	NT	Stage 1 HC (pers comms) confirmed that there have been no activities outside of approved construction hours for Stage 1. Stage 2 KS (pers comms) confirmed that there have been no activities outside of approved construction hours for Stage 2.
	(b) Decoupling works required to be completed during station outages; or	NT	See Schedule 2, Condition B14 (a) above.
	(c) for the delivery of materials required by the police or other authorities for safety reasons; or	NT	See Schedule 2, Condition B14 (a) above.
	(d) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.	NT	See Schedule 2, Condition B14 (a) above.
Dust and air emissions			
B15	The Applicant must take all reasonable and feasible steps to: (a) minimise odour, fume and dust emissions of the development;	C	Stage 1 No odour, fume or dust emissions were identified during the audit site inspection. Sighted image of excavation works with dust suppression occurring simultaneously. HC (pers comms) confirmed that no complaints have been received for the Project in relation to odour, fume or dust emissions during the audit period. Sighted PBE Site Management Plan dated

Cond	Project Approval SSD 8889679	Status	Evidence
			October 2022 which notes that where possible all PBE workers, contractors and visitors will take reasonable steps to minimise odour, fume and dust emissions. The PBE Site Management Plan also lists odour, fume and dust emissions control measures for the Project including provision of a water cart for dust suppression, regular visual inspections of work areas, any stockpile heights will have a maximum height designed to reduce potential wind mobilisation, speed restrictions and signage to be put in place, wash down facilities will be made available (vacuum truck, water cart hose or similar) prior to vehicles leaving site under muddy conditions, all construction and maintenance equipment and vehicles are to be operated and maintained to the manufacturer's specifications, and be regularly serviced, engines & equipment to be switched off when not in use and limit the quantity of chemical products stored on site to the extent practical. Stage 2 KS (pers comms) confirmed that there has been no issues or complaints for odour or dust during the audit period for Stage 2. No odour, fume or dust emissions were identified during the audit site inspection. Sighted copy of Liddell Power Station Battery Energy Storage System Air Quality Management Sub Plan dated 16 June 2023. Table 3 of the plan provides environmental management measures for air quality. Table 5 of the plan provides a TARP with

Cond	Project Approval SSD 8889679	Status	Evidence
			actions for odour and dust.
	(b) eliminate or minimise the risk of spontaneous combustion; and	C	Stage 1 Sighted PBE Site Management Plan dated October 2022 which notes where possible all PBE workers, contractors & visitors shall take reasonable steps to eliminate or minimise the risk of spontaneous combustion. No odour, fume or dust emissions were identified during the audit site inspection. Stage 2 KS (pers comms) confirmed that spontaneous combustion risk for Stage 2 demolition work completed during the audit period was minimal. No odour, fume or dust emissions were identified during the audit site inspection.
	(c) minimise to the greatest extent practicable, dust generating surfaces exposed on the site.	NC	Stage 1 HC (pers comms) confirmed that hydromulch seeding was used following the completion of construction for areas around the Stage 1 facility but that seeding had not taken in some areas. Some areas of exposed surfaces on stockpiles and exposed contour banks surrounding the completed Stage 1 facilities were observed during the site inspection (see Plate 1, Plate 4 and Plate 9). KS (pers comms) noted that AGLM are planning to reseed the exposed areas for Stage 1 again to minimise exposed surfaces.

Cond	Project Approval SSD 8889679	Status	Evidence
			It is recommended that AGLM complete retreatment of the residual exposed areas where the initial cover crop seeding was not successful, to minimise exposed areas that could result in dust generation as far as practicable. Stage 2 KS (pers comms) confirmed the disturbed areas for Stage 2 were hydromulched as soon as possible to minimise dust. An adequate cover crop over disturbed areas was observed (see Plate 13 and Plate 17).
Visual			
B16	The Applicant must: (a) minimise the off-site visual impacts of the development;	C	Stage 1 HC (pers comms) noted all work is completed during approved day time construction hours only. The site inspection confirmed that the completed Project works are limited in scale, with minimal visual impact or views available from public roads. Stage 2 The site inspection confirmed that Project works at the time of the audit are limited in scale, with minimal views available from public roads.
	(b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and	C	Sighted PBE correspondence dated 25 January 2023 confirming that Project buildings will be clad in "Pale Eucalypt". Colorbond. The site inspection confirmed that the visual appearance of the Project blends in as far as possible with the surrounding

Cond	Project Approval SSD 8889679	Status	Evidence
			landscape, see Plate 10 . No permanent infrastructure has been developed for Stage 2.
	(c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	C	Stage 1 The site inspection confirmed that there has been no mounting of any advertising signs or logos on site, except where required for identification or safety purposes. Stage 2 KS (pers comms) confirmed that only signs for identification and safety purposes (with site contact name and numbers) were used during the audit period. No permanent infrastructure has been developed for Stage 2.
Lighting			
B17	The Applicant must: (a) minimise the off-site lighting impacts of the development; and	C	Stage 1 The site inspection confirmed that Project works at the time of the audit are limited in scale, with minimal views available from public roads. All fixed lighting for Stage 1 sighted during the site inspection was hooded and directed down below the horizontal (see Plate 7). Stage 2 KS (pers comms) confirmed that lighting was not required for Stage 2 work completed during the audit period.
	(b) ensure that any external lighting associated with the development:	C	Stage 1 The audit site inspection confirmed that

Cond	Project Approval SSD 8889679	Status	Evidence
	- is installed as low intensity lighting (except where required for safety or emergency purposes); - does not shine above the horizontal; and - complies with <i>Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version.		there is external fixed lighting on the site required for safe access to Stage 1 facilities, see Plate 7 and Plate 10. The site inspection confirmed that external fixed lighting was hooded and positioned down below horizontal at the time of the audit. Sighted extract from Stage 1 Project tender specification which notes that all equipment, components and materials shall be in accordance with the most recent editions, revisions and amendments of Standards and Codes including AS 1158 lighting for public places and roads. Stage 2 KS (pers comms) confirmed that external lighting for Stage 2 was not required during the audit period.
HERITAGE			
Protection of Heritage Items			
B18	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items located outside the development footprint.	C	Stage 1 HC (pers comms) confirmed that known heritage sites are located outside of the development footprint will not be impacted as part of Stage 1 of the Project. The Liddell Power Station Decoupling Works Aboriginal Cultural Heritage Management Plan (ACHMP) dated 22 August 2022 describes the procedure for sites outside the development footprint. Section 3.7 notes that other known sites are a sufficient distance away from the ACHMP Area so as not to represent an

Cond	Project Approval SSD 8889679	Status	Evidence
			impact risk and the construction footprint will be demarcated or communicated to contractors to ensure no disturbance outside of the approved area. Stage 2 Sighted DPE Aboriginal Cultural Heritage Management Plan for Liddell Battery and Bayswater Ancillary Works – Stage 2 letter dated 5 July 2023. The letter notes the approval of the ACHMP (Stage 2) (rev 3, dated 28 June 2023). KS (pers comms) confirmed that all work completed during the audit period was in alignment with the Stage 2 ACHMP. No impacts to heritage sites have been identified.
B19	If any previous unknown Aboriginal object of Aboriginal place is discovered on the site, or suspected to be on the site: (a) all work in the immediate vicinity of the object or place must cease immediately; (b) a 10m buffer area around the object or place must be cordoned off; and (c) Heritage NSW must be contacted immediately.	NT	Stage 1 Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded Aboriginal objects or places have been identified within the ACHMP area. HC (pers comms) confirmed that no new heritage sites have been identified during Project construction and that the AGLM site induction covers unexpected finds procedures. Sighted PBE site familiarisation that describes cultural and Aboriginal artifacts management. The site familiarisation notes that work must cease and the area to be barricaded by 10m to prevent any damage or loss to the discovered site. Stage 2

Cond	Project Approval SSD 8889679	Status	Evidence
			KS (pers comms) confirmed that no new heritage sites have been identified during Stage 2 works and that the AGLM site induction provided to all contractors covers unexpected finds procedures.
B20	Work in the immediate vicinity may only recommence if: (a) the potential Aboriginal object is confirmed by Heritage NSW, in consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal place; (b) the Cultural Heritage Management Plan is revised to include the Aboriginal object and appropriate measures in respect of it; or (c) the Planning Secretary is satisfied with the measures to be implemented in respect of the Aboriginal object and makes a written direction in that regard.	NT	Stage 1 Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded Aboriginal objects or places have been identified within the ACHMP area. HC (pers comms) confirmed that sites identified in the EIS are not relevant to Stage 1 of the Project. Stage 2 KS (pers comms) confirmed that this has not been triggered during the audit period for Stage 2.
B21	The Applicant must ensure that all known Aboriginal objects or Aboriginal places on the site and within any offset areas are properly recorded, those records are kept up to date and are reported to the Aboriginal Heritage Information Management System (AHIMS).	NT	Stage 1 Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded Aboriginal objects or places have been identified within the ACHMP area. Stage 2 KS (pers comms) confirmed that this has not been triggered during the audit period for Stage 2.
Cultural Heritage Management Plan			
B22	B22. The Applicant must prepare an Aboriginal Cultural Heritage Management Plan for the development. The plan must (a) be prepared by suitably qualified and experienced persons approved by the Secretary;	C	Stage 1 Sighted DPHI approval letter dated 31 August 2022 for the Liddell Power Station

Cond	Project Approval SSD 8889679	Status	Evidence
			Decoupling Works ACHMP dated 22 August 2022 which was prepared by AECOM Australia Pty Ltd. HC (pers comms) confirmed there was no change to the Stage 1 ACHMP during the audit period. Stage 2 Sighted copy of ACHMP for Liddell Battery and Bayswater Ancillary Works – Stage 2 letter dated 5 July 2023. The letter notes that the nominee of the Planning Secretary approves the ACHMP (Stage 2) (rev 3, dated 28 June 2023).
	(b) be prepared in consultation with Registered Aboriginal Parties and Heritage NSW;	C	Stage 1 Sighted DPE letter dated 31 August 2022 which notes the Stage 1 ACHMP has been prepared in consultation with RAPs and Heritage NSW. NSW and Registered Aboriginal Parties and contains the information required by the conditions of approval. Stage 2 Sighted DPE letter dated 5 July 2023 which notes the Stage 2 ACHMP has been prepared in consultation with Heritage NSW and Project RAPs.
	(c) be submitted to the Planning Secretary for approval prior to carrying out construction under this consent;	C	Stage 1 Sighted AGLM notification of commencement letter dated 12 August 2022 which notes pre-construction activities and physical works are scheduled to commence on the Stage 1 Decoupling Works on 1 September 2022.

Cond	Project Approval SSD 8889679	Status	Evidence
			The letter also notes that the ACHMP was lodged on the 8 July 2022. DPE approved the ACHMP via letter dated 31 August 2022. Stage 2 Sighted copy of DPE letter dated 5 July 2023 which notes that approval of the ACHMP for Stage 2 (rev 3, dated 28 June 2023).
	(d) describe the measures to be implemented on the site to: (i) comply with the heritage-related operating conditions of this consent; (ii) ensure all workers receive suitable Aboriginal cultural heritage inductions prior to carrying out any activities which may cause impacts to Aboriginal objects or Aboriginal places, and that suitable records are kept of these inductions; (iii) protect, monitor and/or manage identified Aboriginal objects and Aboriginal places (including investigation of design options to avoid disturbance of Aboriginal objects) in accordance with the commitments made in the document/s listed in condition A2(c); (iv) protect Aboriginal objects and Aboriginal places located outside the approved disturbance area from impacts of the development; (v) manage the discovery of suspected human remains and any new Aboriginal objects or Aboriginal places, including provisions for burials, over the life of the development; (vi) maintain and manage reasonable access for relevant Aboriginal stakeholders to Aboriginal objects and Aboriginal places (outside of the approved disturbance area); and (vii) facilitate ongoing consultation and involvement of Registered Aboriginal Parties in the conservation and management of Aboriginal cultural heritage on the site; and (viii) include a strategy for the care, control and storage of Aboriginal objects salvaged on the site, both during the life of the development and in the long term.	C	Stage 1 (i) Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022. (ii) Section 8 of the ACHMP describes training and inductions. Section 8 notes general Aboriginal cultural heritage management training is provided to all AGLM employees and contractors through the site induction process at Liddell Power Station. Employees and contractors will also be made aware of their legal responsibilities under the <i>NP&W Act 1974</i>. (iii) Section 3 of the ACHMP describes Management of Aboriginal Cultural Heritage Values. (iv) Section 3.7 describes management of sites outside the Development Footprint. (v) Section 3.3 of the ACHMP describes Unanticipated Finds Protocol including Aboriginal

Cond	Project Approval SSD 8889679	Status	Evidence
			Objects/Places and Human Skeletal Remains. (vi) Section 3.6 of the ACHMP describes Care and Control of Salvaged Objects. Section 3.6 notes Aboriginal community members may wish to access sites for appropriate cultural purposes (e.g. education and ceremony). AGLM will facilitate reasonable access upon request and reasonable access will be subject to Bayswater Power Station's operational requirements. (vii) Section 4.5 of the ACHMP describes ongoing RAP consultation. HC (pers comms) confirmed that no consultation with RAPs has been required during the audit period. (viii) Section 3.6 of the ACHMP describes Care and Control of Salvaged Objects. Section 3.6 notes a long-term management strategy has not yet been established by Liddell Power Station or the RAPs. As such, salvaged Aboriginal objects will remain in the temporary storage location until a decision is made. Any decisions regarding the long-term management of Aboriginal objects will be made in consultation with RAPs and Heritage NSW. A long-term management strategy will be

Cond	Project Approval SSD 8889679	Status	Evidence
			prepared prior to power station closure. Stage 2 (i) Sighted copy of Liddell Power Station Battery Energy Storage System ACHMP dated 28 June 2023. (ii) Section 9 of the Stage 2 ACHMP describes training and inductions noting that generic Aboriginal cultural heritage management training is provided to all employees and contractors through the site induction process at Liddell Power Station. (iii) Section 4 of the Stage 2 ACHMP describes management of Aboriginal Cultural Heritage Values. (iv) Section 4.7 of the Stage 2 ACHMP describes management for sites outside the development footprint noting that a number of Aboriginal sites are located outside the ACHMP area but within the Liddell Power Station site, It is noted that other known sites are a sufficient distance away from the ACHMP area so as not to represent an impact risk. (v) Section 4.3 of the Stage 2 ACHMP describes an unanticipated finds protocol.

Cond	Project Approval SSD 8889679	Status	Evidence
			(vi) Section 4.6 of the Stage 2 ACHMP describes care and control of salvaged objects. (vii) Section 5.5 of the Stage 2 ACHMP describes ongoing RAP consultation. (viii) Section 4.6 of the Stage 2 ACHMP notes that should any Aboriginal objects/ places be identified within the ACHMP and approved for salvage, they would be moved as soon as practicable to the temporary storage location within the Bayswater Power Station Administration Building. The ACHMP notes that a long term management strategy has not yet been established by AGLM or the RAPs. Salvaged Aboriginal objects would remain in the temporary storage location until a decision is made.
B23	The Applicant must implement the Aboriginal Cultural Heritage Management Plan approved by the Planning Secretary.	C	See comments in Schedule 2, Condition B22 above.
SOIL AND WATER			
Water Supply			
B24	The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.	C	Stage 1 HC (pers comms) confirmed that there has been no change to the approved Stage 1 Soil and Water Management Plan (WMP) dated 22 August 2022. Section 3.2.5 of the Soil and Water Management Plan describes Water Supply

Cond	Project Approval SSD 8889679	Status	Evidence
			and AGL Hunter River Water Allocations, which are sufficient to meet the demand for the Stage 1 construction works during the audit period. The site inspection confirmed that water is available from a standpipe at the top of the construction area. The hydrant is connected to the wider AGLM site water management system. Stage 2 KS (pers comms) confirmed that a WMP for Stage 2 of the Project has been developed and is available on the AGLM website (see Schedule 2, Condition C1). KS (pers comms) confirmed that the main water demand for Stage 2 work to the time of audit is for water cart dust suppression, but these volumes has been well within capacity during the audit period. KS (pers comms) confirmed that the AGL Annual Reporting demonstrates there are adequate water supplies for Stage 2, given the relatively small demand for dust suppression requirements.
Water Pollution			
B25	The Applicant must ensure that all surface discharges from the development comply with all relevant provisions of the POEO Act, including any discharge limits (both volume and quality) set for the development in any EPL.	C	Stage 1 HC (pers comms) confirmed that there has been no discharge recorded during the audit period. HC (pers comms) confirmed any sediment water from the construction area is captured in the existing Liddell site water management system. The site inspection confirmed that

Cond	Project Approval SSD 8889679	Status	Evidence
			sediment controls are generally in place at the Stage 1 site, see Plate 1 to Plate 4. Inspection of the Stage 1 area confirmed that sediment fencing around the residual topsoil stockpile needs maintenance, see Plate 2. It is recommended that these controls are reinstated. The site inspection also noted that all chemicals for the Project are contained and in appropriate bunding. Stage 2 KS (pers comms) confirmed that no discharges have been recorded during the audit period. KS (pers comms) confirmed sediment fences are in place and any sediment run off would be captured in Lake Liddell. KS (pers comms) confirmed there is regular repair and maintenance of the sediment fences around Stage 2 work areas. The audit site inspection verified that sediment fencing remains in place (see Plate 12 and Plate 16).
Operating Conditions			
B26	The Applicant must: (a) ensure the development is designed, constructed and maintained to minimise impacts on surface water, flooding and groundwater at the site;	C	Stage 1 HC (pers comms) confirmed any sediment water from the construction area is captured in the existing Liddell site water management system. Sighted Liddell Decoupling Works WMP dated 22 August 2022. HC (pers comms) confirmed no change to the approved WMP was made during the

Cond	Project Approval SSD 8889679	Status	Evidence
			audit period. Section 3.2.4 of the WMP notes that the Project is not located on land that is mapped under the Singleton LEP as being susceptible to flooding. No mapping for flood prone land is available under the Muswellbrook LEP. The Battery and Decoupling footprints are elevated above the maximum water level of Lake Liddell and away from drainage lines. Section 4.2.2 of the WMP notes indirect impacts to the groundwater environment during construction may occur because of potential spills or leaks of hazardous materials occurring during construction and migrating to the water table. Potential spills or leaks may include oils, lubricants and fuels used by construction plant. The site inspection confirmed that sediment and erosion controls are generally in place for the Project laydown and construction areas, see Plate 1 to Plate 4. All chemicals used for the Project were stored in bunding at the time of the site inspection. Stage 2 Sighted erosion and sediment control measures during the site inspection, see Plate 12, Plate 14 and Plate 16. Sighted a copy of the Liddell Power Station Batter Storage System Soil and Water Management Sub Plan dated 16 June 2023 for Stage 2. Section 4.4 of the plan notes that the Project is not located in a flood

Cond	Project Approval SSD 8889679	Status	Evidence
			prone area and that the footprint would be located on land that is above the maximum water level of Lake Liddell and away from drainage lines.
	(b) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version;	NC	Stage 1 Sighted PBE toolbox talk dated 4 July 2023 that notes discussions were held in regard to inspecting sediment fences and monitoring them throughout the day. Sighted PBE toolbox talk dated 28 March 2023 which notes sediment run off on the eastern end of pad and the need for installation of hay bales and sediment fencing. Erosion and sediment controls were observed to be in place for the Project laydown and construction areas during the audit site inspection (refer Plate 1 to Plate 4). An Erosion and Sediment Control Plan (ESCP) documenting stockpile locations for the Project was not in place at the time of audit, as required under Section 5.1 of the Soil and Water Management Plan. It is recommended that stockpile locations and dates of establishment for each stockpile are recorded in an updated ESCP for Stage 1. It is also recommended that erosion and sediment controls are maintained for the residual stockpile of material excavated from the Stage 1 construction area (see Plate 2). Stage 2

Cond	Project Approval SSD 8889679	Status	Evidence
			Sighted Concept Erosion and Sediment Control Plan (ESCP) in Appendix A of the Soil and Water Management Sub Plan for Stage 2 dated 12 June 2023. The objective of the ESCP is to ensure that appropriate procedures are in place to minimise soil erosion and potential discharge of sediment to downstream waters during construction. Sighted erosion and sediment control measures during the site inspection, see Plate 12, Plate 14 and Plate 16.
	(c) ensure the battery energy storage system and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and	C	Stage 1 N/A Stage 2 Sighted a copy of the Liddell Power Station Battery Energy Storage System Soil and Water Management Sub Plan dated 16 June 2023. Table 4 of the plan includes management measures for soil and water. The plan notes that an ESCP will be prepared pre construction. See Schedule 2, Condition B26(b) above.
	(d) ensure all works are undertaken in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (NRAR, 2018), or its latest version unless DPE Water agrees otherwise.	NT	See Schedule 2, Condition B26 (c) above.
WASTE			
B27	The Applicant must: (a) take all reasonable steps to minimise the waste generated by the development;	C	KS (pers comms) confirmed that there are waste management plans for both stages of the Project. Stage 1 Sighted the Liddell Decoupling Works Waste Management Plan dated 22 August 2022. The Waste Management Plan

Cond	Project Approval SSD 8889679	Status	Evidence
			identifies the key waste issues that require control to manage Project waste impacts. Section 3.3 of the Waste Management Plan notes materials with minimal packaging requirements should be used, removal of packaging should occur offsite by suppliers, and fabrication of parts should be conducted offsite. The site inspection confirmed that waste is being segregated into separate skip bins (see Plate 5). Sighted copy of NSW EPA Online Waste Tracking System Transport Certificate – No. 2T01387893 dated 1 December 2023 for drums containing waste which must be tracked. Sighted copy of NSW EPA Online Waste Tracking System Transport Certificate – No. 2T01349599 for lead acid batteries. Sighted copy of NSW EPA Online Waste Tracking System Transport Certificate – No. 2T01388141 for mineral oils unfit for their original intended use. Sighted copy of Remondis tax invoice 1931254 for pump out of septic. Stage 2 KS (pers comms) confirmed that all Stage 2 general waste is removed by Remondis. Sighted copy of NSW EPA Online Waste Tracking System Transport Certificate – No. 2T01338313 for N100 – containers and drums containing controlled waste residues. Sighted copy of NSW EPA Online Waste

Cond	Project Approval SSD 8889679	Status	Evidence
			Tracking System Transport Certificate – No. 2T01338316 for drums containing waste residues. Sighted stockpiles of waste yet to be removed from the Stage 2 demolition area during the site inspection, see Plate 15. See Schedule 2, Condition B27(d) below.
	(b) classify all waste in accordance with the <i>Waste Classification Guidelines</i> (EPA, 2014);	C	Stage 1 HC (pers comms) confirmed that waste is required to be managed in accordance with the Stage 1 Waste Management Plan dated 22 August 2022. HC (pers comms) confirmed that Remondis is contracted for routine emptying of bins and removing empty oil drums for the Project. HC (pers comms) confirmed that no asbestos has been identified during the audit period for Stage 1 and that personnel work under the AGLM Asbestos procedure. Sighted copy of AGL Macquarie – Liddell Power Station Monthly Waste Statistics Report December 2023 which shows waste types removed from site. Stage 2 Sighted copy of Solar Array – Waste Classification / Assessments Sampling and Analysis Quality Plan 24003865.001A. The document notes that Kleinfelder was engaged by AGLM to undertake waste classification and validation assessment of the stockpiled and residual soils associated with the Liddell Power Station BESS works that may be contaminated (see Plate 15).

Cond	Project Approval SSD 8889679	Status	Evidence
			Sighted copy of ALS certificate of Analysis dated 24 November 2023 which identified asbestos in two samples from the Stage 2 area. This included samples from a piece of asbestos cement sheeting and a collection of lagging-like material.
	(c) dispose of all waste at appropriately licensed waste facilities or as expressly permitted in an applicable EPL; and	C	Stage 1 HC (pers comms) confirmed that Project waste is disposed of appropriately at a licenced waste facility. The site inspection confirmed that waste is being segregated into separate skip bins. (see Plate 5). See Schedule 3, Condition B27(a) above. Stage 2 KS (pers comms) confirmed that all Stage 2 waste had been disposed of at a licenced waste facility, with the exception of a residual waste stockpile with asbestos material that was under investigation at the time of audit. See Schedule 3, Condition B27(a) and B27(b) above.
	(d) manage any asbestos or asbestos-contaminated materials identified during construction and operation of the development in accordance with the requirements under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> .	C	Viewed a copy of the AGLM Asbestos Management Procedure, AGLM-HSE-PRO-007.10.01 which outlines responsibilities, procedures/ protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos. Stage 1 HC (pers comms) confirmed that no asbestos was identified during the audit

Cond	Project Approval SSD 8889679	Status	Evidence						
			period. Stage 2 Viewed Kleinfelder (5 January 2024) AGL Liddell Solar Array – Waste Classification / Assessment Sampling and Analysis Quality Plan. The document outlines sampling and QA/QC procedures for the classification of residual waste and soils associated with the Stage 2 demolition works (see Plate 15). KS (pers comms) confirmed that asbestos was identified during the audit period and that the material stockpile was flagged off. KS (pers comms) confirmed that sampling was completed by 23 November 2023 after the potential asbestos was identified. ALS Certificate of Analysis sighted work order EN2311845 sighted, dated 24 November 2023. Reports one piece of asbestos cement sheeting approximately 40x30x5mm and a collection of lagging-like material.						
DECOMMISSIONING AND REHABILITATION									
B28	The Applicant must rehabilitate the development to the satisfaction of the Planning Secretary. The rehabilitation must comply with the objectives in Table 2. <i>Table 2: Rehabilitation Objectives</i> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>All areas of the site affected by the development</td><td> • → Safe, stable and non-polluting • → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise • → Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use </td></tr><tr><td>Community</td><td>• → Ensure public safety at all times</td></tr></table>	Feature	Objective	All areas of the site affected by the development	• → Safe, stable and non-polluting • → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise • → Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use	Community	• → Ensure public safety at all times	NT	Stage 1 HC (pers comms) confirmed that there has been no requirement for Stage 1 rehabilitation during the audit period. HC (pers comms) confirmed that the material that is currently stockpiled will be used on site to remediate the redundant switching station site then will be incorporated into the adjacent surroundings and seeded. Sighted stockpile during site inspection, see Plate 2.
Feature	Objective								
All areas of the site affected by the development	• → Safe, stable and non-polluting • → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise • → Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use								
Community	• → Ensure public safety at all times								

Cond	Project Approval SSD 8889679	Status	Evidence
			Sighted copy of Removal of 33kV Yard Infrastructure and Remediation of Site Scope of Works document dated 6 December 2023. Within the scope of work post demolition of the structures is an allowance to cap the entire area approximately 300mm and blend into the adjacent surroundings. Stage 2 KS (pers comms) noted that areas disturbed for Stage 2 were not available for rehabilitation. Temporary groundcover of areas disturbed for Stage 2 development work has been established (see Plate 13 and Plate 17).
SCHEDULE 2: PART C – ENVIRONMENTAL MANAGEMENT AND REPORTING			
ENVIRONMENTAL MANAGEMENT			
Environmental Management Strategy			
C1	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: (a) provide the strategic framework for environmental management of the development;	C	Stage 1 Sighted AGLM Liddell Environmental Management Strategy (EMS) dated 22 August 2022 which provides the strategic framework of the Project. DPE approved the Project EMS and sub-plans via letter dated 31 August 2022. Stage 2 Sighted copy of Liddell Power Station Battery Energy Storage System EMS (Stage 2 EMS) dated 16 June 2023. The Stage 2 EMS was approved on 19 June 2023.
	(b) identify the statutory approvals that apply to the development;	C	Section 3 of the EMS for both Stage 1 and Stage 2 describes the statutory approvals

Cond	Project Approval SSD 8889679	Status	Evidence
			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;	C	Stage 1 Section 7.3 of the Stage 1 EMS outlines proposed key roles and responsibilities for both AGLM, contractors and sub-contractors working on all stages of the Project. Stage 2 Section 4.3 of the Stage 2 EMS describes roles and responsibilities.
	(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	C	(i) Section 6.2 of the Stage 1 EMS describes Stakeholder Consultation. AGLM maintains a community reference group known as the AGLM Community Dialogue Group which meets quarterly. Sighted Community Dialogue Group meeting minutes dated 23 June 2022 and 3 March 2022. Section 5 of the Stage 2 EMS describes community and stakeholder consultation. (ii) Section 6.3 of the Stage 1 EMS describes Complaint and Enquiry Management. The EMS notes that complaints will be recorded in the Community Complaints Register AGLM-HSE-REG-008.09.2. HC (pers comms) confirmed no issues have been raised by regulatory agencies or the local community during audit period. Sighted copy of the Stage 1 complaints register on the website. Section 5.3 of the Stage

Cond	Project Approval SSD 8889679	Status	Evidence
			2 EMS describes complaints handling. Sighted copy of the Stage 2 complaints register on the website. (iii) Section 6.3 of the Stage 1 EMS describes dispute management. Section 5.3 of the Stage 2 EMS describes dispute resolution. (iv) Section 7.7 of the Stage 1 EMS describes compliance management. Section 7.7.1 of the Stage 1 EMS notes that Environmental incidents and hazards (non-conformances and non-compliances) shall be entered into myHSE and managed in accordance with the Incident, Near Miss and Hazard Management Procedure AGL-HSE-PRO-012.1. An Action Management record raised by HC dated 19 June 2023 in response to the previous IEA was sighted. The action records action source, site, action owner, action required and the due date. Stage 2 (i) Section 9 of the Stage 2 EMS describes compliance and reporting procedures. Sighted copy of AGLM SAPUIS Export which records hazards, incidents and near misses, event dates, event status and main risk level.

Cond	Project Approval SSD 8889679	Status	Evidence
			(ii) Section 7.5 of the stage 2 EMS describes Incident and emergency management. Section 7.5.2 of the stage 2 EMS notes each Contractor strategy or management plan will detail an emergency response plan that will deal with the management of incidents that constitute an emergency. Section 4.5 of the Stage 2 EMS describes incident and emergency management and section 4.5.2 describes emergency response. (iii) Section 5.3 of the Stage 2 EMS describes the procedures to receive, handle, respond to and record complaints. (iv) Section 5.3 of the Stage 2 EMS notes the procedures of how to resolve any disputes that may arise. (v) Section 9 of the Stage 2 EMS describes the procedures to respond to any non compliance. (vi) Section 4.5 of the Stage 2 EMS describes the procedures to respond to emergencies.
	(e) include: (i) the following subplans: • soil, stormwater, water quality, flood and spoil management; • construction and decommissioning noise, including an out-of-hours works protocol; • air quality management; • contamination, including an unexpected finds protocol	NC	Stage 1 (i) Sighted Liddell Decoupling Works EMS Stage 1 sub-plans dated 22 August 2022, including: - Soil and Water Management Plan; - Construction Noise

Cond	Project Approval SSD 8889679	Status	Evidence
	- waste management; and - traffic. (ii) references to any strategies, plans and programs approved under the conditions of this approval; and (iii) a clear plan depicting monitoring to be carried out under the conditions of this approval.		Management Plan, which includes an out of hours work protocol; - Air Quality Management Plan; - Contamination Management Plan, which includes an accidental discovery protocol for unexpected finds; - Waste Management Plan; and - Traffic Management Plan. Planned Strategies, Plans and Programs for the approval of DPE are listed in Section 1.2, Table 1 of the Stage 1 EMS. (ii) Appendix B of the Stage 1 EMS provides a plan depicting monitoring to be carried out under the conditions of this approval. (iii) The Stage 1 EMS does not include a clear plan depicting the locations of monitoring to be carried out under the conditions of SSD 8889679. Stage 2 (i) Sighted sub plans for Stage 2, including: Air Quality Management Sub Plan; Contamination Management Sub Plan; Construction Noise and Vibration Sub Plan; Soil and Water Management Sub Plan; Traffic Management Sub Plan; and Waste Management Sub Plan.

Cond	Project Approval SSD 8889679	Status	Evidence
			(ii) The Stage 2 EMS does not have a plan depicting monitoring to be carried out under the conditions of this approval. (iii) Planned Strategies, Plans and Programs for the approval of DPE are listed in Table 2 of the Stage 2 EMS. It is recommended that the Stage 1 and Stage 2 EMS documents are reviewed and updated to include plan(s) showing the locations of monitoring to be carried out under the conditions of SSD 8889679.
C2	Applicant must implement the Environmental Management Strategy approved by the Planning Secretary.	C	See Schedule 2, Condition C1 above.
Revision of Strategies, Plans and Programs			
C3	Within 3 months, unless the Planning Secretary agrees otherwise, of: (a) the submission of an incident report under condition C4 below;	NT	HC (pers comms) confirmed there have been no submissions of incident reports in relation to the Project.
	(b) the submission of an audit report under condition C13 below; and	NT	Sighted DPE email confirming AGLM has lodged an updated ACHMP for review on the 7 July 2023. Stage 1 HC (pers comms) confirmed that AGLM has completed a review of management plans and no updates were required. Sighted copy of AGL Macquarie Pty Limited – Status of Management Plan Updates for SSD 8889679 letter addressed to the DPE dated 7 July 2023. The letter notes that AGLM have completed a review and have determined that no updates to

Cond	Project Approval SSD 8889679	Status	Evidence
			management plans are required at this stage. Stage 2 Not triggered; no previous IEA for Stage 2.
	(c) the approval of any modification to the conditions of this consent; or	NT	No modifications to SSD 8889679 have been approved by DPE.
	(d) a direction of the Secretary under condition A3 of Schedule 2; the Applicant must review and, if necessary, revise the studies, strategies or plans required under the conditions of consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary.	NT	HC (pers comm) confirmed there have been no written directions made by the Secretary regarding Project plans, strategies and programs.
	Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.	NT	Note only.
COMPLIANCE			
Incident Notification, Reporting and Response			
C4	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.	NT	HC and KS (pers comms) confirmed that there have not been any incidents during the audit period.
Non-Compliance Notification			
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.	C	Stage 1 HC (pers comms) confirmed an IEA response submission was made after the previous IEA. Sighted copy of SSD 8889679 IEA Report Submission letter addressed to DPE dated 5 May 2023 that notes a response from AGLM to the IEA recommendations attached.

Cond	Project Approval SSD 8889679	Status	Evidence
			Stage 2 Not triggered; no previous IEA for Stage 2.
C6	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	NT	HC (pers comms) confirmed that this has not been triggered for both Stage 1 or Stage 2.
C7	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	NT	See Schedule 2, Conditions C4 and C5 above.
Compliance Reporting			
C8	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020).	NT	A period of 52 weeks has not elapsed since Stage 1 of the Project entered the operational phase. It is recommended that AGLM implement a process to ensure that Compliance Reports are prepared for the Project in accordance with DPE (2020) Compliance Reporting Post Approval Requirements.
C9	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed to by the Planning Secretary.	NT	See Schedule 2, Condition C8 above.
C10	The Applicant must make each Compliance Report publicly available within 60 days of submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	NT	See Schedule 2, Condition C8 above.
C11	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	NT	See Schedule 2, Condition C8 above.
NOTIFICATIONS			
Notification of Department			
C12	Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department via the Major Projects website	C	Stage 1 Sighted AGLM notification of

Cond	Project Approval SSD 8889679	Status	Evidence
	portal of the date of commencement, or cessation, of the relevant phase. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.		commencement letter to DPE dated 12 August 2022 which notes pre-construction activities and physical works are scheduled to commence on the Stage 1 Decoupling Works on 1 September 2022. Stage 2 Sighted copy of AGL SSD- 8889679: Notification of commencement of construction and request to defer Independent Environmental Audit which notes that AGLM is notifying the Department that construction of the BESS will commence on or soon after Monday 17 July 2023.
INDEPENDENT ENVIRONMENTAL AUDIT			
C13	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020, or its latest version).	C	This IEA (see Appendix A)
C14	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	C	Sighted copy of DPE endorsement letter dated 12 January 2024 which notes that NSW Planning has reviewed the auditor nominations and based on the information you have provided is satisfied that the proposed audit team is suitably qualified, experienced, and independent.
C15	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020, or its latest version), upon giving at least 4 weeks' notice (or timing) to the Applicant of the date upon which the audit must be commenced.	NT	Noted.
C16	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020, or its latest version), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C13 of this approval, or condition C15 where notice is given by the Planning Secretary;	C	a) AGLM to review and respond to this IEA. b) AGLM to respond to this IEA. c) AGLM to make this IEA and response

Cond	Project Approval SSD 8889679	Status	Evidence
	(b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.		publicly available.
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.	C	Sighted DPE email stating 230804 Liddell Batter and Bayswater Ancillary Works Independent Environment Audit was lodged on 4 August 2023. It is recommended that the AGLM response to the findings of this IEA provides comment on all identified non-compliances and improvement recommendations.
C18	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	NT	HC (pers comms) confirmed that there have been no requests made by AGLM to cease ongoing independent operational audit requirements.
ACCESS TO INFORMATION			
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	C	(i) The EIS is publicly available on the AGLM website. (ii) Development Consent SSD 8889679 is available on the AGLM website. (iii) Development Consent SSD 8889679 is available on the AGLM website. (iv) The ACHMP, EMS and EMS sub-plans (see Schedule 2, Condition C1) are publicly available on the AGLM website. (v) Stage 1 and Stage 2 of the Project are outlined on the AGLM website. (vi) Complaints and Enquiries hotline

Cond	Project Approval SSD 8889679	Status	Evidence
			number, email address and postal address are available on the AGLM website. (vii) Complaints registers for both Stage 1 and Stage 2 sighted on the AGLM website. (viii) The AGL response to the previous SSD 8889679 IEA report was published on the AGLM website. It is recommended that the responses to IEA reports available on the AGLM website indicate which audit they relate to. (ix) HC (pers comms) confirmed nil other matters required by the Planning Secretary during the audit period.
	(b) keep this information up to date.	C	See Schedule 2, Condition C19(a) above.
SCHEDULE 2: PART D – CONDITIONS EXTRACTED FROM CONSENTS REFERRED TO IN CONDITION A5			
	<i>Note: For the avoidance of doubt, a consent listed in condition A5 will be surrendered and cease to operate from the date on which a valid notice is served on the consent authority pursuant to cl 97 of the EP&A Regulation. The conditions listed in this Part D are drawn from the consents listed in condition A5 but form part of this consent from the date of this consent.</i>	NT	Note only.
CONDITIONS FROM DA 8.2018.273.2 - LOW PRESSURE PUMP STATION STABILISATION (SINGLETON COUNCIL)			
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:	C	HC (pers comms) noted that AGLM have commenced the process to surrender the required consents. HC (pers comms) confirmed that the date of surrender has been extended to the 15 of February 2024, in consultation with DPHI.

Cond	Project Approval SSD 8889679	Status	Evidence						
	<table><tr><th>Title</th><th>Written-By</th><th>Date</th></tr><tr><td>Bayswater Low-Pressure Pump Stabilisation Biodiversity Development Assessment Report</td><td>HLA - Envirosciences GHD</td><td>December 2018</td></tr></table>	Title	Written-By	Date	Bayswater Low-Pressure Pump Stabilisation Biodiversity Development Assessment Report	HLA - Envirosciences GHD	December 2018		
Title	Written-By	Date							
Bayswater Low-Pressure Pump Stabilisation Biodiversity Development Assessment Report	HLA - Envirosciences GHD	December 2018							
D2	Site Contamination Issued During Construction - Should any new information come to light during demolition or construction works which has the potential to alter previous conclusions about site contamination, the Planning Secretary must be immediately notified by the applicant, and works must cease. Works must not recommence on site until approval is granted by the Planning Secretary.	NT	HC (pers comms) confirmed that there has been no new information come to light during demolition or construction works which has the potential to alter previous conclusions about site contamination. Sighted Liddell Battery and Bayswater Ancillary Works Contamination Assessment dated 18 March 2021 prepared by Jacobs. The assessment notes that the elevated hydrocarbon concentrations present in the decoupling area unlikely to constrain the Project development.						
CONDITIONS FROM DA 20_98 - DEVELOPMENT OF RAVENSWORTH COAL UNLOADER FACILITY (SINGLETON COUNCIL)									
D3	The development of the Ravensworth Coal Unloader Facility must be carried out in accordance with the following document: <table><tr><th>Title</th><th>Written-By</th><th>Date</th></tr><tr><td>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</td><td>HLA - Envirosciences HLA</td><td>December 1997</td></tr></table>	Title	Written-By	Date	Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement	HLA - Envirosciences HLA	December 1997	C	Viewed AGLM correspondence to DPE dated 7 September 2021 which summarises the status of EIS commitments for the consents required to be surrendered under the conditions of SSD 8889679, including DA 20_98. HC noted that the operation of the Ravensworth Coal Unloader Facility is managed by Aurizon. Viewed a copy of the Antiene and Newdell: Operational Environmental Management Plan dated 18 October 2022 and AGLM maintenance records sheet 'Newdell Unloader Workorder since Jan 2022' dated 25 July
Title	Written-By	Date							
Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement	HLA - Envirosciences HLA	December 1997							

Cond	Project Approval SSD 8889679	Status	Evidence
			2023. It is recommended that AGLM retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.
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.	C	HC noted that the operation of the Ravensworth Coal Unloader Facility is managed by Aurizon. Viewed a copy of the Antiene and Newdell: Operational Environmental Management Plan dated 18 October 2022 and AGLM maintenance records sheet 'Newdell Unloader Workorder since Jan 2022' dated 25 July 2023. Sighted copy of email dated 28 February 2024 from Aurizon to HC. The email provides an extract from a train schedule for Antiene. It is recommended that AGLM 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.
BIODIVERSITY CONSERVATION DIVISION			

Cond	Project Approval SSD 8889679	Status	Evidence
D5	(a) The applicant is to prepare and implement a site Environmental Management Plan for the Ravensworth Coal Unloader Facility relating to: (i) Locations and designs for clean and contaminated water pathways, with detailed design drawings for all sediment basins. (ii) Segregated pathways and storage facilities for clean and contaminated stormwater runoff, with segregated reuse priority for contaminated water. (iii) A commitment not to allow any excess contaminated runoff to enter Bowmans Creek, and a suitable monitoring programme to demonstrate that no excess contaminated water leaves the site. (iv) A maintenance schedule for the pollution traps identifying cleaning periods and methods of disposal. (v) A maintenance schedule for the sediment ponds identifying cleansing periods and methods of disposal. (b) The applicant is to demonstrate a commitment to maintaining final drainage lines in a stable condition.	C	Viewed the Aurizon 'Antiene and Newdell: Operational Environmental Management Plan' dated 18 October 2022. The document identifies controls and maintenance requirements for the management of the AGLM Newdell coal unloading facility by Aurizon (the previous Ravensworth Coal Unloader Facility).
CONDITIONS FROM DA 401_2000 - COAL/RAIL UNLOADER AUGMENTATION (SINGLETON COUNCIL)			

Cond	Project Approval SSD 8889679	Status	Evidence						
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: <table><tr><th>Title</th><th>Written-By</th><th>Date</th></tr><tr><td>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</td><td>HLA – Envirosciences</td><td>August 2000</td></tr></table>	Title	Written-By	Date	Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation	HLA – Envirosciences	August 2000	C	Viewed AGLM correspondence to DPE dated 7 September 2021 which summarises the status of EIS commitments for the consents required to be surrendered under the conditions of SSD 8889679, including DA 401_2000. HC noted that the Ravensworth Coal Unloader Facility is managed by Aurizon. Viewed a copy of the Antiene and Newdell: Operational Environmental Management Plan dated 18 October 2022 and AGLM maintenance records sheet 'Newdell Unloader Workorder since Jan 2022' dated 25 July 2023. It is recommended that AGLM 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.
Title	Written-By	Date							
Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation	HLA – Envirosciences	August 2000							

Cond	Project Approval SSD 8889679	Status	Evidence
APPENDIX 4 – INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS			
WRITTEN INCIDENT NOTIFICATION REQUIREMENTS			
B1	A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 7 of Schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred.	NT	HC (pers comms) confirmed there were no notifiable incidents related to the Project occurred during the audit period.
B2	Written notification of an incident must: (a) identify the development and application number; (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) identify how the incident was detected; (d) identify when the applicant became aware of the incident; (e) identify any actual or potential non-compliance with conditions of consent; (f) describe what immediate steps were taken in relation to the incident; (g) identify further action(s) that will be taken in relation to the incident; and (h) identify a project contact for further communication regarding the incident.	NT	See comment in Appendix 4, Condition B1.
B3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	NT	See comment in Appendix 4, Condition B1.
B4	The Incident Report must include: (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders regarding the incident.	NT	See comment in Appendix 4, Condition B1.

Table C2 **RTS Updated Mitigation Measures (Jacobs, 2021)**

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
Hazard and risk				
HR1	During detailed design for the Project: - A detailed bushfire threat assessment will be conducted for the Project, including establishment of an APZ, in consultation with the RFS - The separation distance between infrastructure within the Battery will be determined in accordance with applicable Codes and Standards and manufacturer's recommendations so that the preferred strategy of allowing a fire in one Battery enclosure or inverter to burn without the risk of propagating to other infrastructure can be maintained without the need for external firefighting - The separation distance within the Battery will be determined in accordance with applicable Codes and Standards and manufacturer's recommendations to allow safe escape in case of a fire - The need for active firefighting requirements at the Battery will be determined in consultation with RFS, FRNSW and the DPIE. Detailed fire fighting response and any need for fire water containment will be assessed and reported (e.g. in the format of a Fire Safety Study) post development approval, for review by DPIE, Fire rescue NSW and the RFS. The FSS will be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Study Guidelines (HIPAP No. 2) - The health and safety associated with EMF on the site and the potential exposure to EMF will be considered for AGLM staff and contractors as part of AGLM's obligations for their health and wellbeing under the Work Health and Safety Regulations 2011 (NSW) - Measures to prevent a leak occurring from the brine pipeline, the emergency diesel generators and at the Battery, and for secondary containment should a leak occur, will be included as part of the detailed design of the Project. The likelihood of a significant loss of containment event associated with this Project (Level 4) will be designed to Rare in accordance with AGL's Risk Management and Assessment Standard - The PHA be progressed to a FHA once the design of the development has been finalised. Commitments identified in the PHA will be integrated into the management for the Project. - The register of commitments (Appendix 1 of the PHA (Planager Pty Ltd, 2021)) will be integrated into the management for the Project. This includes integration of 84 individual commitments, including for the design, installation and maintenance of the Battery	Detailed design	NT	Stage 1 Sighted AGLM letter to DPE dated 12 August 2022 which notes that a Fire Safety Study is not required for Stage 1 of the Project (Decoupling Works) and that a Fire Safety Study will be undertaken prior to commencing construction of the BESS. HC (pers comms) confirmed that the battery and brine pipeline works have not commenced during the audit period. Stage 2 Sighted letter from the Department referring to the AGLM letter dated 1 December 2022 and revised letter dated 25 January 2023. The DPHI letter approves the proposed staging of the fire study. See Schedule 2, Condition B2 above.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	automatic shutdown system on exceedance of safe limits; installation of deflagration venting and fire protection inside the Battery enclosures; design of the brine pipeline, waste oil facility, emergency diesel generators and the Battery such that the risk of pollution from a release is reduced to ALARP; installation of protective barriers, including at the transformers; and application of a rigorous and formal management of change process for the Project, including detailed hazard identification and risk assessment processes.			
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	Detailed design	NT	Stage 1 Viewed email dated 24 January 2024 from the Stage 1 Project Manager to HC. The email notes the new substation developed for Stage 1 does not meet the criteria under the ICNIRP for EMF mitigation. Stage 2 KS (pers comms) noted new electrical infrastructure has not been developed for Stage 2 at the time of audit.
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.	Prior to construction	C	Copies of the AGL Management of Change Standard version 1.2, dated 27 April 2021 and Integrated Energy Management of Change Process Flowchart were sighted. Section 25.3 of the PBE Project Execution Plan dated September 2022 notes that Change Management processes will be used for Project control scope and

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				variations with AGLM. A copy of PBE Construction Risk Assessment Register dated 5 October 2022 was sighted for the construction of the 330/33kV Substation. Sighted overview of the Management of Change structure in SAP via the use of the D2 notification process which is aligned to the AGL Management of Change project close out process.
HR4	Storage and management of dangerous goods and hazardous materials (if required) will occur in a safe, secure location consistent with the requirements of applicable Australian Standards.	Construction / operation	C	See comments in Schedule 2, B4 above. Sighted bunding for Stage 1 transformers, see Plate 6. During the site inspection, all chemicals on both sites were stored in adequate bunding.
HR5	Refuelling will take place in a designated area within the works area, away from ignition sources and trees or vegetation and with appropriate controls to prevent any spills coming into contact with the ground.	Construction / operation	NC	Stage 1 HC (pers comms) confirmed that all contractor vehicles are taken off site for refuelling. Sighted the PBE (Project contractor) Site Management Plan dated October 2022 which notes all fuelling maintenance and servicing of vehicles will be

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				done away from any environmentally sensitive area. If refuelling cannot be done away from site, consideration should be given to the location (i.e., away from a water course) and spill kits must be readily available. Stage 2 Evidence was not available at the time of audit to confirm a designated refuelling area and procedures had been established for Stage 2 works. It is recommended that an area is delineated and communicated to the Project Contractor.
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.	Construction / operation	C	Sighted copy of AGL 330/33kV Transition Substation Project Site Familiarisation Ref: 62090-25 Rev 3 which covers spill kit requirements. A spill kit was available for both Stage 1 and Stage 2 areas at the time of the site inspection.
HR7	Temporary construction compounds will be maintained in a tidy and orderly manner to minimise potential fuel loads in the event that any construction compounds are affected by fire.	Construction	C	The audit site inspection confirmed that that Stage 1 and Stage 2 Project construction areas are being maintained in a tidy and

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				orderly manner, see Plate 10 and Plate 11 .
HR8	Construction activities involving flammable materials and ignition sources (for example, welding) will be proactively managed to ensure that the potential for fire is effectively minimised. High risk construction activities, such as welding and metal work, would be subject to a risk assessment on total fire ban days and restricted or ceased as appropriate. Construction personnel will be inducted into the requirement to safely dispose of cigarette butts.	Construction	C	HC (pers comms) confirmed that designated smoking areas are available on site. HC (pers comms) confirmed that AGLM have a hot work procedure and a hot work checklist that is to be completed prior to any hot work on site. Sighted AGLM Hot Work Checklist AGLM-HSE-FRM-007.04.01 and AGL Hot Work Procedure AGLM-HSE-PRO-007.04. The Hot Work Procedure describes the systems and equipment required to be used where personnel must perform hot work tasks, including the identification and assessment of risks and the type of controls that must be in place to ensure that the work is conducted safely.
HR9	An emergency response plan for the Battery would be prepared for the Project and provided to the Local Emergency Management Committee.	Construction / operation	NT	Stage 1 N/A Stage 2 Section 4.5 of the Stage 2 EMS describes incident and emergency management and Section 4.5.2 describes

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				emergency response.
Air Quality				
AQ1	The following will be undertaken to manage fugitive emissions from stored chemicals: - Limiting the quantity of chemical products stored at the site to the extent practical - Ensure that all storage tanks are fitted with the appropriate controls in-line with the Protection of the Environment Operations (Clean Air) Regulation 2010.	Construction / operation	C	Stage 1 Sighted Liddell Decoupling Works Air Quality Management Plan (AQMP) dated 22 August 2022 which describes control measures for fugitive emissions from stored chemicals as limiting the quantity of chemical products stored at the site to the extent practical and ensuring that all storage tanks are fitted with the appropriate controls in-line with the Protection of the Environment Operations (Clean Air) Regulation 2010. The audit site inspection confirmed that there were limited volumes of chemical products stored at the Project construction area. Stage 2 Section 6 of the Liddell Power Station Battery Energy Storage System Air Quality Management Sub Plan dated 16 June 2023 describes environmental management measures including measures to be undertaken to manage

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				fugitive emissions from stored chemicals.
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.	Construction	NC	Stage 1 HC (pers comms) confirmed that regular visual inspection of work areas are completed to determine if additional dust suppression controls are required. Section 4 of the AQMP outlines controls to minimise dust emissions during Project construction work. HC (pers comms) confirmed that dust suppression equipment is available on site during bulk earthworks and a dedicated water cart is present at all times for both Stage 1 and Stage 2. Sighted a copy of a tax invoice dated 31 October 2023 for water cart hire. Stage 2 Sighted Plant and Equipment Register that notes water cart plant ID 35025 dated 30 September 2023. Sighted copy of Plant and Equipment – Induction document dated 30 September 2023 for water

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				trailer 35025. Evidence was not available at the time of the audit to confirm dust mitigation controls were implemented during the loading and unloading of materials during Stage 2. It is recommended that AGLM document the implementation of control measures for Project loading and unloading activities.
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.	Construction	C	The AQMP notes source specific control measures shall be routinely implemented (e.g. water spraying roads for dust suppression of traffic movements). The AQMP also notes that wash down facilities will be made available prior to vehicles leaving site to minimise mud and silt transfer offsite. Further measures may also be included to reduce the impact of mud and silt such as a rattle grid. Stage 1 Sighted copy of Liddell Transition Substation – Daily Report dated 2 November

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				2023 which states environmental controls of monitoring conditions which is a daily focus, in addition the demob of the 4t digger which to comply with new road requirements must be cleaned prior to departure. Sighted image of driver hosing down vehicle to remove any debris. Stage 2 HC (pers comms) confirmed that a water cart is available on site. Sighted copy of tax invoice for water cart hire dated 31 October 2023. Sighted copy of the Liddell Power Station BESS Air Quality Management Sub Plan dated 16 June 2023 which notes while hauling materials in trucks regular watering of unsealed haulage routes will be undertaken and regular inspection and removal of debris from plant and equipment to avoid the tracking of materials onto the adjacent road network.
AQ4	The following will be undertaken to manage exhaust emissions from plant and equipment: Inspecting all plant and equipment before it is used on-site	Construction	C	Stage 1 HC (pers comms) confirmed that pre-start checks for

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	- Ensuring that all vehicles, plant, and equipment are operated in a proper and efficient manner - Switching off all vehicles, plant and equipment when not in use for extended periods - Avoiding the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable.			equipment are undertaken before use. The AQMP notes all construction and maintenance equipment and vehicles are to be operated and maintained to the manufacturer's specifications and be regularly service to minimise exhaust emissions. The AQMP also notes that Engines and equipment should be switched off when not in use and where reasonable and feasible, low emission plant and equipment should be adopted and used on site. The site inspection confirmed that all vehicles, plant and equipment were switched off when not in use for extended periods. Stage 2 KS (pers comms) confirmed that pre-start checks for equipment are undertaken before use. Section 6 of the Stage 2 Air Quality Management Sub Plan describes environmental management measures including measures to be taken to

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				manage exhaust emissions from plant and equipment.
AQ5	Activities will be coordinated between the Project and the WOAOW project to limit the potential for cumulative dust impacts where possible.	Construction	NT	Section 4 of the AQMP notes activities will be coordinated between the Decoupling works and the Bayswater WOAOW Project to limit the potential for cumulative dust impacts where possible. HC (pers comms) stated that this commitment is related to Stage 3 of SSD 8889679 and therefore is not yet triggered.
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.	Construction	NC	Stage 1 Section 4 of the AQMP notes that stockpiles of soils across the Project will be managed to reduce dust emission including spraying with water or covering. Viewed pre-start inspection records for a watercart used for the Project by FCS, completed 5 June 2023. No evidence of dust emissions from stockpiles and exposed surfaces was observed during the audit site inspection (see Plate 10). During the site inspection a

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				stockpile was sighted that was not cover cropped, see Plate 2. KS (pers comms) confirmed that the site has attempted treatment of residual exposed surfaces for Stage 1, which was unsuccessful in some areas due to weather conditions and noted that exposed areas are relatively small. It is recommended that exposed surfaces on stockpiles no longer required for Stage 1 construction are reseeded where previous treatment was not successful. Stage 2 Section 6 of the Stage 2 Air Quality Management Sub Plan describes environmental management measures including watering stockpiles and exposed surfaces and progressive rehabilitation of exposed surfaces that are no longer required for construction.
Greenhouse gases				
GHG1	The CEMP will include requirements for identification and minimise greenhouse gases (GHG) during construction.	Construction	C	Stage 1 HC (pers comms) confirmed

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				that reduced idling and use of modern / efficient equipment are mitigation measures to minimise GHG during construction. Section 4 of the AQMP includes control measures for minimising GHG emissions during construction. Stage 2 KS (pers comms) confirmed that there is no idling of vehicles which is a mitigation measure to minimise GHG emissions. Sighted copy of the Liddell Power Station BESS Air Quality Management Sub Plan dated 16 July 2023. Table 3 of the plan notes that switching off all vehicles, plant and equipment will be undertaken when not in use for extended periods to manage exhaust emissions. No vehicle were seen idling during the site inspection.
Noise and vibration				
NV1	The CEMP would identify Project construction activities with the potential to have noise impacts and the controls required to avoid, minimise and mitigate these impacts. The standard techniques for controlling noise impacts during construction are presented in the	Construction	C	Stage 1 Sighted copy of the Liddell Decoupling Works -

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	Interim Construction Noise Guideline (ICNG). During construction relevant standard measures as outlined in Section 6 of the ICNG will be implemented.			Construction Noise Management Plan (NMP) dated 22 August 2022. Section 5 of the NMP provides details of the mitigation and management measures proposed to address potential noise impacts resulting from the Project. Section 3.1 of the NMP notes that the ICNG was used to determine construction Noise Management Levels for the Project which are to act as noise criteria for the construction and decommissioning phase of works. Stage 2 Sighted copy of the Liddell Power Station BESS Construction Noise Management Sub Plan dated 16 June 2023. Section 7 of the plan provides details of mitigation and management measures proposed to address potential noise impacts resulting from the Project. Section 2.1 of the plan notes that the ICNG is a main guideline relevant to the plan.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
Traffic and transport				
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.	Pre-construction and construction	C	Sighted Liddell Decoupling Works - Traffic Management Plan dated 22 August 2022 which provides an oversized overmass vehicle route map. Sighted email dated 19 June 2023 addressed to AGLM employees and contractors informing of concrete trucks being escorted on site and entering onto the substation construction area. The email states that personnel should be aware of the additional vehicle movements on the day and where possible use alternate site access to reduce vehicle interactions.
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.	Pre-construction and construction	C	Stage 1 Sighted copy of permit from ODLS who transported the main transformers required for Stage 1 from their factory in Victoria to the site. Sighted NHVR Oversize and/or Overmass (OSOM) Mass or Dimension Exemption Permit number 755201V3 with permit period 17 July 2023 to 15 October 2023. Stage 2

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				KS (pers comms) noted no OSOM movements were required for Stage 2 during the audit period.
TT3	The CEMP and general site induction will inform construction and operational personnel of the risk of collisions, particularly with animals during rain or periods of low light.	Pre-construction and construction	C	Stage 1 The AGL Liddell Environmental Management Strategy (EMS) dated 22 August 2022, notes that speed limits within the Project area would be limited to 40 km/hr to minimise the risk of vehicle collision with fauna. HC (pers comms) confirmed that the site induction for construction and operational personnel informs of the risk of collisions and includes a 40 km site speed limit. Sighted 40km speed limit signage during the site inspection, see Plate 8. Stage 2 KS (pers comms) confirmed that the site induction for construction and operational personnel for Stage 2 informs of the risk of collisions and includes a 40 km site speed limit.
Biodiversity				

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
BIO	Future detailed design phase will increase retainment of native vegetation.	Pre- construction	C	Stage 1 HC (pers comms) confirmed that this is not relevant at this stage of Project. Stage 2 Sighted copy of the approved BESS BMP dated 7 July 2023. Section 5 of the BMP describes biodiversity management measures including that the future detailed design phase will increase the retainment of native vegetation. Table 4 of the Stage 2 BMP notes that further investigation will include a review of completed vegetation surveys and management plans undertaken for Liddell Power Station. The results of these surveys will be correlated with the detailed design to minimise vegetation clearing, with preference for the retention of high value native vegetation and / or vegetation providing habitat for native fauna.
BIO1	Exclusion zones, or 'No-Go' zones, will be mapped in CEMP and mapping made available to all construction personnel.	Pre- construction	C	HC (pers comms) confirmed that the location of No-Go zones are communicated

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				during site inductions. The EMS also notes that mitigation measures including the installation of appropriate signage such as 'No Go Zone' or 'Environmental Protection Area' will be implemented. Sighted example of the site wide communication system which highlights changes to access due to key Project activities dated 27 August 2023. Stage 2 KS (pers comms) confirmed that the location of No-Go zones are communicated during site. Sighted flagging and fencing of Stage 2 Project boundary during the site inspection, see Plate 11 and Plate 12.
BIO2	Woody debris (logs and mulch) produced during vegetation clearing will be re-spread over any cleared areas to protect the soil surface from erosion and to aid habitat restoration where appropriate.	During construction	C	Stage 1 HC (pers comms) confirmed that native vegetation clearing has not occurred during the audit period. Stage 2 Sighted vegetation stockpiles during the Stage 2 site inspection, see Plate 13.
BIO3	An inspection of native vegetation to be impacted (within the construction footprint) will be	Immediately	C	Stage 1

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	conducted by an ecologist immediately prior to vegetation clearing works (to confirm absence of fauna species). A Spotter/Catcher ecologist must supervise vegetation clearing. In the unlikely event that fauna is present, works will cease until animals can be captured and removed from the construction footprint. Construction crews will be made aware that any native fauna species encountered must be allowed to leave site without being harassed. Trenches / holes will be inspected each morning and any trapped fauna removed or provide a mechanism for fauna to escape.	prior to vegetation clearing / During construction		HC (pers comms) confirmed that this is not relevant as Stage 1 of the Project does not involve any clearing of native vegetation. Stage 2 KS (pers comms) confirmed that a spotter/catcher ecologist supervised Stage 2 vegetation clearing. Sighted Solar Array Demolition Fauna Spotter Catcher Inspection dated 24 November 2023, prepared by Kleinfelder.
BIO4	Vehicle movements on newly formed access tracks or construction zones will be limited to 20km/h speed limit to reduce the risk of vehicle strike to fauna.	During construction	NT	HC and KS (pers comms) confirmed that there newly formed access tracks were not required during the audit period. No new access tracks were sighted during site inspection for Stage 1 or Stage 2.
BIO5	Where native vegetation is removed topsoil is to be retained from excavation areas within construction footprint (where possible). Topsoil stockpiles will be delineated and protected from machinery compaction and contamination during construction. Following construction and infill, topsoil will be re-spread over impacted native vegetation areas (to retain native seedbank and assist with natural revegetation). Avoid stockpiling in the vicinity of drainage lines.	During construction	NC	Stage 1 HC (pers comms) confirmed that native vegetation clearing has not been required for the current stage of the Project. A stockpile established for Stage 1 has not been delineated in the field, see

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Plate 2. It is recommended that material stockpiled during Stage 1 of the Project is delineated in the field and the location recorded. Also see Condition B26(b) in Table C1. Stage 2 Sighted temporary areas of topsoil material stockpiled within the disturbance area for Stage 2 during the site inspection, see Plate 14.
BIO6	Accurately and clearly mark out the limits of the construction footprint (only where native vegetation exists). No activities including parking and turning of vehicles and plant/ equipment will occur beyond the construction footprint. The Construction footprint will be demarcated prior to commencement of works in areas where native vegetation exists.	During construction	C	The audit site inspection confirmed that flagging has been used to clearly mark out the limits of the construction footprint for Stage 1 and Stage 2, see Plate 1 and Plate 11 .
BIO7	Materials, plant, equipment, work vehicles and soil/rock stockpiles to be placed to avoid damage to surrounding vegetation and will be outside tree drip-lines. Construction workers and vehicles will not access areas beyond delineated construction footprints.	During construction	C	Stage 1 The EMS notes that materials, plant, equipment, work vehicles and soil/rock stockpiles will be placed to avoid damage to surrounding vegetation and outside tree drip-lines. Construction workers and vehicles will not access areas beyond the delineated development site.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				The audit site inspection confirmed that flagging has been used to clearly mark out the limits of the construction footprint, see Plate 1. No construction workers or vehicles were identified in areas beyond delineated construction footprint during the audit site inspection. Stage 2 No construction workers or vehicles were identified in areas beyond delineated construction footprint during the audit site inspection. The audit site inspection confirmed that flagging has been used to clearly mark out the limits of the Stage 2 construction footprint, see Plate 11.
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).	During construction	C	Stage 1 HC (pers comms) confirmed that where possible entering areas of significant weed infestations with machinery or personnel is avoided. Sighted copy of Pre Mobilisation Weed, Seed and Pathogen Inspection

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				dated 12 September 2023 for plant number 32273 which notes 470 excavator has been re-sprayed and is clear and free from soil, dirt and material. Stage 2 KS (pers comms) confirmed that where possible, entering areas of significant weed infestations with machinery or personnel is avoided. Sighted copy of Pre Mobilisation Weed, Seed and Pathogen inspection form dated 12 September 2023. The inspection notes that 470 excavator has been re-sprayed and is clean and free from soil, dirt and material.
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.	Pre-construction or during construction	C	HC (pers comms) confirmed that weed control for the AGL site is managed under contract. Stage 1 The EMS notes that weed control will be undertaken by suitably qualified and / or experienced personnel as required. HC (pers comms) confirmed that Koora Industries cleared

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	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).			around the site as requested in November 2023. Sighted quote from Koora Industries dated 9 November 2023 for lawn maintenance. KS provided examples of weed, seed and pathogen inspection for gear coming onto site dated 12/9/23 (for excavator), which states the equipment is clear of soil and materials. Stage 2 Sighted copy of HSE Site Inspection Checklist dated 11 October 2023 that notes there are no weeds in the area that require management. Sighted copy of HSE Site Inspection Checklist dated 1 and 3 November 2023. The inspection records that no weeds necessary to be separated. The inspection also records that weeds in the area require management and to be managed following completion of demolition works by the Stage 2 demolition contractor. Sighted copy of HSE Site

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Inspection Checklist dated 15 November 2023 that records there are no weeds in the area that require management.
BIO10	During the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species.	During construction	NC	It is noted that the construction and laydown areas for Stage 1 of the Project are generally located in previously disturbed areas, however evidence of weed disposal and management was not available at the time of the audit for Stage 1. 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. It is recommended that during the clearing works for future stages of the Project, weeds will be disposed of and managed appropriately to stop the spread of existing weed species and records are retained. Stage 2 Sighted a copy of Wonnarua

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Mine Rehabilitation Pty Ltd letter dated 19/2/24 which noted on the 6th November 2023, WMR Pty Ltd employee removed seed heads from pampas grass in accordance to the JSEA within the Solar Array demolition area. The letter also notes that seed heads were bagged and disposed of in a general waste bin on site. Areas of weed infestation (primarily galenia and other exotics) were observed within the Stage 2 footprint (see Plate 17). It is recommended that treatment of these areas is undertaken and monitored, with evidence of weed treatment and disposal retained.
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.	During construction	C	Stage 1 The AQMP notes wash down facilities will be made available prior to vehicles leaving site to minimise mud and silt transfer offsite. Further measures may also be included to reduce the impact of mud and silt such as a rattle grid.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Viewed contract service reports and PBT Toolbox talk dated 28 March 2023 noting that all vehicles must be washed down before leaving site. Stage 2 See Schedule 2, Condition B8 of Table C1.
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.	During construction	C	Stage 1 The EMS notes pathogen management measures will be established to prevent introduction and spread of amphibian chytrid fungus, <i>Phytophthora cinnamomi</i> and Exotic Rust Fungi. Stage 2 Sighted copy of Pre-Mobilisation Weed, Seed and Pathogen Inspection dated 12 September 2023 for plant number 32273 which notes 470 excavator has been re-sprayed and is clear and free from soil, dirt and material.
BIO13	Avoid excessive noise and vibration during construction activity. Construction activities to be carried out during diurnal hours.	During construction	C	No excessive noise or vibration was identified during the audit site inspection. The audit site inspection confirmed that plant and

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				equipment were switched off when not in use. HC (pers comms) confirmed that work is limited to standard hours of construction. HC (pers comms) confirmed that there has been no complaints received during the audit period in relation to noise and vibration. Section 5 of the NMP provides details of the mitigation and management measures proposed to address potential noise impacts resulting from the Project. Stage 2 KS (pers comms) confirmed that there has been no complaints received during the audit period for Stage 2 in relation to noise and vibration.
BIO14	Erosion and sediment controls will remain in place until all rehabilitation has been completed. Drainage lines will be protected from runoff and stockpiling of spoil.	During construction	C	The audit site inspection confirmed that erosion and sediment controls are in place at the Stage 1 and Stage 2 Project sites to minimise impacts to drainage lines, see Plate 3. General improvement recommendations for Stage

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				1 erosion and sediment controls are described in Condition B26(b) of Table C1 and in commitment BIO 15 below.
BIO15	Revegetation of slopes or exposed soil areas will be undertaken as soon as possible, in accordance with the CEMP. Landscaping of exposed surfaces using native indigenous species only. Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder).	During construction / post construction	NC	Stage 1 No rehabilitation has occurred during the audit period. An exposed stockpile and small areas of exposed contour banks were observed around the completed Stage 1 facility during the site inspection, see Plate 1 and Plate 10. HC (pers comms) confirmed that hydromulch seeding was used following the completion of construction for areas around the Stage 1 facility. KS (pers comms) noted that hydromulch application is planned to be completed again to minimise exposed surfaces. It is recommended that AGLM complete retreatment of the residual exposed areas where the initial cover crop seeding was not successful, to minimise exposed areas

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				that could result in dust generation as far as practicable. Stage 2 KS (pers comms) confirmed that hydromulch seeding has taken place for Stage 2 to provide a cover crop. Viewed temporary groundcover within the Stage 2 work area, as established to minimise exposed areas (see Plate 17).
BIO16	Future detailed design phase will enhance retainment of native vegetation. Patches of native vegetation which are located near larger patches of native vegetation will be prioritised for retainment.	Pre-construction	C	Stage 1 HC (pers comms) confirmed that there are no patches of remnant vegetation in proximity to construction work undertaken during the audit period. Stage 2 Sighted boundary flagging and fencing for delineation of disturbance footprint during the site inspection, Plate 11 and Plate 12.
Land and contamination				
Lo1	The internal bunding and environmental controls for hazardous substances management suitable for the Battery and transformers will be in accordance with applicable guidelines.	Detailed design	C	Sighted bunding during site inspection, see Plate 6 .
Lo2	Potential contamination-related impacts associated with the Project will be managed by the implementation of a CEMP that includes (but not limited to):	Construction	C	See SoC Lo1 above. The EMS notes the strategy

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	- An unexpected finds protocol for the appropriate assessment and management of encountered contamination to mitigate impacts to the development - Procedures to ensure that all material excavated during the construction of the development is appropriately assessed and classified before being disposed of in accordance with environmental laws - Specific control measures to mitigate impacts to soil, water, air, noise, traffic, structures and clear protocols for measurement of affected media and validation of results during construction of the development.			for managing potential contamination related impacts for the Project is provided in the Contamination Management Subplan. Sighted Liddell Decoupling Works - Contamination Management Plan dated 22 August 2022 which provides an accidental discovery protocol for Unexpected Finds. Section 5.3 of the Contamination Management Plan also notes where potential contamination finds are not applicable for potential reuse as backfill they will be classified and disposed of at a lawful place in accordance with the <i>NSW EPA Waste Classification Guidelines 2014</i> and the <i>Liddell Battery Decoupling Works Waste Management Plan</i>. Section 5.1 of the Contamination Management Plan provides specific contamination control measures.
L03	The Asbestos Management Procedure would be updated as required to provide appropriate control measures during the construction phase (as well as the operational phase if maintenance	Construction / operation	C	Viewed a copy of the AGLM Asbestos Management

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	activities are required) to mitigate any risks of worker exposure to airborne asbestos fibers during work activities.			Procedure, AGLM-HSE-PRO-007.10.01 which outlines responsibilities, procedures / protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos.
Lo4	Detailed design of each Project component would consider and address geotechnical stability risks in accordance with applicable design standards.	Detailed design	C	Viewed the Geotechnical Investigation – Liddell Power Station dated 11 March 2022, prepared by Construction Sciences. The Construction Sciences report assesses the Project site and provides geotechnical recommendations.
Aboriginal heritage				
AH1	A Cultural Heritage Management Plan (CHMP) will be developed. It will include the methodologies developed in the ACHAR (Section 11.1, 11.2 and 11.3 of the ACHAR). It will specify that Project works will be restricted to the disturbance site. It will include provisions to ensure workers are made aware of cultural heritage places and their value, for example through Project inductions. The CHMP will include provisions to guard against indirect impact to the Aboriginal sites near the development site. The CHMP will also include a detailed methodology for the salvage and long-term management of any Aboriginal objects that may be impacted by the proposed works.	Pre-construction	C	Stage 1 Sighted Liddell Power Station Decoupling Works Aboriginal Cultural Heritage Management Plan (ACHMP) dated 22 August 2022. Section 3.7 of the ACHMP notes that the construction footprint will be demarcated or communicated to contractors to ensure no disturbance outside of the

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				approved area. HC (pers comms) confirmed that site inductions cover Aboriginal cultural heritage management. Section 8.0 of the ACHMP notes generic Aboriginal cultural heritage management training is provided to all employees and contractors through the site induction process at Liddell Power Station. Employees and contractors will also be made aware of their legal responsibilities under the NP&W Act 1974. HC (pers comms) confirmed that other known sites are a sufficient distance away from the ACHMP area so as not to represent an impact risk. Section 3.7 of the ACHMP notes that a number of Aboriginal sites are located outside the ACHMP area but within the Liddell Power Station site. These sites are not to be impacted as part of the decoupling component of the Project. Management of these sites will be included in separate ACHMPs developed for

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				other components of the Project. The audit site inspection confirmed flagging is used to identify the Project boundary and ensure no disturbance outside of the approved area, see Plate 1. Stage 2 Sighted copy of the Stage 2 ACHMP dated 28 June 2023. Section 4.7 of the Stage 2 ACHMP notes that the construction footprint will be demarcated or communicated to contractors to ensure no disturbance outside of the approved area (see Plate 11). Section 9 of the Stage 2 ACHMP describes training and inductions and notes that generic Aboriginal cultural heritage management training is provided to all employee and contractors through the site induction process at Liddell Power Station. Section 4.7 of the Stage 2 ACHMP describes procedures for sites outside the development footprint.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Section 4.6 of the Stage 2 ACHMP describes care and control of salvaged objects.
AH2	If repair or maintenance works on the Liddell to Jerrys Plains High Pressure Pipeline are required, the area of works will be subject to surface collection in accordance with Section 11 of the ACHAR (Appendix F) of impacted sites. The sites that maybe impacted include: • Liddell Jerrys Plains Pipeline AS1 (37-2-6280) • Liddell Jerrys Plains Pipeline IF2 (37-2-6281) • Liddell Jerrys Plains Pipeline AS3 (37-2-6279) • Liddell Jerrys Plains Pipeline IF4 (37-2-6291) • Liddell Jerrys Plains Pipeline AS5 (37-2-6290) • Liddell Jerrys Plains Pipeline AS6 (37-2-6289) • Liddell Jerrys Plains Pipeline IF7 (37-2-6287) • Liddell Jerrys Plains Pipeline IF8 (37-2-6288) • Liddell Jerrys Plains Pipeline AS9 (37-2-6286) • Liddell Jerrys Plains Pipeline AS10 • BAYS AS06 (37-2-6145). If no works are required in the vicinity of a site, the site will be conserved.	Pre-construction	NT	HC (pers comms) confirmed that maintenance works on the Liddell to Jerrys Plains High Pressure Pipeline are not relevant to this element of the Project.
AH3	If practicable, the design and construction of the Brine Pipeline will avoid the two recorded site areas (Liddell Pipeline AS1 (37-2-6285) and Liddell Pipeline AS2 (37-2-6282)). The sites will be protected with high visibility fencing. If impact cannot be avoided, the sites will be salvaged through surface collection.	Design, pre-construction, construction	NT	HC (pers comms) confirmed that the design and construction of the Brine Pipeline is not relevant to the current stages of the Project.
AH4	During any works on the Liddell M1 Conveyor the site (Liddell M1 Conveyor AS1 (37-2-6284)) will be conserved and protected by high visibility exclusion fencing to prevent impact.	Construction	NT	HC (pers comms) confirmed that works on the Liddell M1 Conveyor are not relevant to the current stages of the Project.
AH5	The Unanticipated Finds Protocol in the ACHAR will be followed for any previously unidentified	Construction	NT	HC (pers comms) confirmed

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	Aboriginal heritage objects found during the works.	and operation		that there has been no unidentified Aboriginal heritage objects found during the audit period. Section 3.3 of the Stage 1 ACHMP and Section 4.3 of the Stage 2 ACHMP describe the Unanticipated Finds Protocol.
Non-Aboriginal heritage				
NAH1	Should any historical archaeological remains be discovered during construction, all works will stop, the area cordoned off and a heritage professional engaged to examine and advise on the significance of the archaeological finds. If deemed to be of significance, under section 146 (s146) of the Heritage Act, a s146 form would be submitted to notify the Heritage Council of the discovery of relics. Further investigation may be required, and appropriate management will be agreed through consultation with Heritage NSW.	Construction	NT	Stage 1 HC (pers comms) confirmed that there has been no historical archaeological remains discovered during the audit period. Stage 2 KS (pers comms) confirmed that there has been no historical archaeological remains discovered during the audit period.
NAH2	In the unlikely event that human remains are uncovered, all work must cease immediately in the vicinity of the remains and the area cordoned off. The local NSW Police must be notified, who would make an initial assessment as to whether the remains are part of a crime scene, or Aboriginal remains. If the remains are thought to be Aboriginal, Heritage NSW must be contacted as per AH4.	Construction	NT	Stage 1 HC (pers comms) confirmed that no human remains have been uncovered during the audit period. Section 3.3.2 of the ACHMP describes the unanticipated finds protocol for human skeletal remains. Stage 2

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				KS (pers comms) confirmed that no human remains have been uncovered during the audit period. Section 4.3.2 of the Stage 2 ACHMP describes the unanticipated finds protocol for human skeletal remains
Landscape character and visual				
V1	Retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible.	Design	C	Stage 1 Viewed AGLM project design plan 'Liddell 330/30kV Transition Substation Civil Substation Site Road Plan' reference LD 843230_01, which considers the landform requirements for Project Stage 1. It is noted that the construction and laydown areas for Stage 1 of the Project are generally located in previously disturbed areas. The EMS notes the visual and lighting mitigation measures including the retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible. Stage 2 KS (pers comms) confirmed

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				that the site induction and SWMS restricted works to the BESS area and the small vegetation area in the centre will be disturbed under the planned BESS footprint as approved. The site inspection confirmed that the area was flagged to define the approved Stage 2 clearing area, see Plate 11 and Plate 12. KS (per comms) confirmed that the cleared area was mostly industrial and solar array.
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.	Design	C	The EMS notes the visual and lighting mitigation measures including the 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. Detailed designs that confirm colour proposed for permanent infrastructure were sighted for the switchroom and control room buildings. Design drawings notes the external

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				colours being used include Mangrove Green and Surfmist. Sighted PBE correspondence dated 25 January 2023 confirming that Project buildings will be clad in Colorbond "Pale Eucalypt". The site inspection confirmed that the visual appearance of Stage 1 facilities blends in as far as possible with the surrounding landscape, see Plate 10. Stage 2 No infrastructure has been developed for Stage 2 at the time of audit.
V3	Where possible, consider minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare.	Design	C	The EMS notes visual and lighting mitigation measures including where possible, considering minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare. See Commitment V2 above. No large reflective surfaces were observed. It is recommended that the consideration of non-reflective surfaces is

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				documented in the design phase for the development of infrastructure for Stage 2 and future elements of the Project.
V4	Limit the area of disturbance during construction where possible.	Construction	C	The EMS notes the management and mitigation measure of limiting the area of disturbance during construction where possible. The EMS also notes that there will be no vegetation clearance outside of disturbance area outlined in EIS. Stage 1 No additional disturbance for Stage 1 was completed during the audit period, see Plate 10. Stage 2 Section 7 of the Stage 2 EMS describes other environment management measures such as limiting the area of disturbance during construction where possible. The audit site inspection confirmed flagging is used to identify the Stage 2 Project boundary and ensure no disturbance outside of the approved area, see Plate 11

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				and Plate 12.
V5	Mitigation tree and shrub planting will be considered to visually integrate the Project within the surrounding landscape.	Construction	C	Stage 1 The EMS states that mitigation tree and shrub planting will be considered to visually integrate the Project within the surrounding landscape. No supplementary tree plantings occurred during the audit period. Section 6-5.0 of the Removal of 33kV Yard Infrastructure and Remediation of Site Scope of Works dated 6 December 2023 noted that once surface works have been completed, a spray grass product (i.e. seeded hydromulch) would be applied. It is recommended that AGLM consider the need for mitigation tree and shrub planting for Stage 1 to visually integrate the Project within the surrounding landscape and document the findings of this review. It is also recommended that AGLM complete reseeding of areas where the initial cover crop

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				establishment for Stage 1 was not successful. Stage 2 The site inspection confirmed that the areas where Stage 2 works have been completed to date are generally surrounded by existing vegetation and are not visually exposed. It is recommended that AGML complete a review of the full footprint and extent of Stage 2 facilities to confirm whether additional mitigation plantings will be required in future.
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.	Construction	C	Stage 1 The site inspection confirmed that all construction plant, equipment, waste and excess materials are being contained within the designated boundaries of the Project construction area, see Plate 10. The Stage 1 EMS notes stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				visual quality. The Strategy also notes that on completion of the work disturbed areas will be stabilised and rehabilitated. No dust plumes were identified during the audit site inspection (see Plate 10). The AQMP notes stockpiles of soils across the Project will be managed to reduce dust emission including spraying with water or covering. Viewed pre-start inspection records for a watercart used for the Project by FCS, completed 5 June 2023. It is recommended that AGLM retains records of water used for Project dust suppression. Stage 2 No dust plumes were identified during the audit site inspection (see Plate 13 and Plate 17). The Stage 2 site inspection confirmed that all construction plant, equipment, waste and excess materials are being contained within the

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				designated boundaries of the Project construction area, see Plate 17 . Section 7 of the Stage 2 EMS notes stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality. Stockpiles were sighted during the site inspection, see Plate 14 .
Waste				
WR01	A Waste Management Plan will be developed for the Project with the following criteria: • A hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable (disposal) to prioritise waste management strategies to avoid waste generation • The plans will promote the use of materials with minimal packaging requirements, removal of packaging offsite by suppliers and fabrication of parts offsite • Where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors • All waste types will be separated at source for recycling • A licensed service provider will be appointed to collect waste during construction and operation • Each waste type will be classified for transport to ensure correct handling. • Any waste that cannot be recovered or recycled will be disposed of at a suitably authorised or licensed treatment or disposal facility where it will be treated and disposed of according to its classification.	Detailed design	C	Stage 1 Sighted Liddell Decoupling Works - Waste Management Plan dated 22 August 2022. Section 3.3 of the Waste Management Plan notes a hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable (disposal) to prioritise waste management strategies to avoid waste generation. Section 3.3 of the Waste Management Plan notes materials with minimal packaging requirements should be used, removal of

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				packaging should occur offsite by suppliers, and fabrication of parts should be conducted offsite. Section 3.3 of the Waste Management Plan notes where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors. Section 3.3 of the Waste Management Plan notes all waste types are to be separated at the source for recycling. The audit site inspection confirmed that segregated waste skip bins are available on site, site Plate 5. Section 3.3 of the Waste Management Plan notes that: • A licenced service provider will be appointed to collect waste during construction and operation. • Each waste type will be classified for transport to ensure correct handling. • Any waste that cannot

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				be recovered or recycled will be disposed of to a suitably authorised or licensed treatment or disposal facility where it will be treated and disposed of according to its classification. HC (pers comms) confirmed that Project waste is removed from site by Remondis and taken to a licenced facility. Stage 2 Sighted a copy of the Liddell Power Station Battery Energy Storage System Waste Management Sub Plan dated 16 June 2023. Section 5.3 of the plan notes a hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable. Section 5.3 of the plan notes environment management measures including promote the use of materials with minimal packaging requirements, removal of packaging offsite by suppliers and fabrication of

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				parts offsite. Section 5.3 of the plan notes environment management measures including where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or other management) by licensed contractors. Section 5.3 of the plan notes environment management measures including all waste types will be separated at source for recycling. Section 5.3 of the plan notes environment management measures including a licensed service provider will be appointed to collect waste during construction and operation. Section 5.3 of the plan notes environment management measures including each waste type will be classified for transport to ensure correct handling. Section 5.3 of the plan notes environment management measures including any waste that cannot be recovered or recycled will be managed at a suitably

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				authorised or licensed treatment or disposal facility, if required, where it will be treated and managed according to its classification. The audit site inspection for Stage 2 confirmed that segregated waste skip bins are available on site.
WR02	Cleared vegetation will be either mulched for onsite reuse or used to create habitat piles, noting that any weeds and pathogens will be managed according to requirements under the NSW <i>Biosecurity Act 2015</i> .	Construction	C	Stage 1 HC (pers comms) confirmed that there has been no vegetation clearing during the audit period for Stage 1. Stage 2 Stockpiles of cleared vegetation material were sighted during the site inspection, see Plate 13. It is recommended that all cleared vegetation is either mulched onsite for reuse or used to create habitat piles, with weeds and pathogens managed according to requirements under the NSW <i>Biosecurity Act 2015</i>.
Water (surface water and groundwater)				
W1	The specific requirements for water quality controls will be confirmed as the detailed design develops and prior to commencement of construction of each Project component, to ensure the objectives of the Project are achieved.	Pre-construction	C	Stage 1 Sighted Liddell Decoupling Works - Soil and Water

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Management Plan dated 22 August 2022. Section 4.2.1 of the WMP describes the potential impacts to water quality during construction. Section 5.1 of the Soil and Water Management Plan describes water control measures. HC (pers comms) confirmed that no discharges have occurred on site and sediment controls have been implemented for development work. The site inspection confirmed that water quality control measures are in place, see Plate 1 and Plate 3. Stage 2 KS (pers comms) confirmed that no discharges have occurred on the Stage 2 site and sediment controls have been implemented for development work. Section 5 of the Stage 2 Soil and Water Management Sub plan notes that the specific requirements for water quality controls will be confirmed as the detailed

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				design develops and prior to the commencement of construction of each Project component to ensure the objectives of the Project are achieved. Erosion and sediment controls for Stage 2 were viewed during the audit site inspection (see Plate 12 and Plate 16).
W2	The following measures will be undertaken to manage activities in proximity to waterways: • The design and implementation of works within waterfront land would be undertaken in accordance with Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018) • Implementing practices to minimise disturbance of banks and undertake bank stabilization • Appropriate drainage features will be incorporated into the design of the Project components by a suitably qualified and experienced professional. All Project components will be designed and constructed in accordance with relevant guidelines.	Pre-construction and construction	NT	Stage 1 HC (pers comms) confirmed that construction work undertaken during the audit period has not been undertaken in proximity to natural drainage lines or waterways. Stage 2 KS (pers comms) confirmed that construction work for Stage 2 undertaken during the audit period has not been undertaken in proximity to natural drainage lines or waterways.
W3	Stockpiles would be managed to minimise the potential for mobilisation and transport of dust, sediment and leachate in runoff. This would include: • Minimising the number of stockpiles, area used for stockpiles, and time that they are left exposed • Locating stockpiles away from drainage lines, waterways and areas where they may be susceptible to wind erosion	Construction	NC	Stage 1 HC (pers comms) confirmed that no additional stockpiles are required for Stage 1 of the Project. Sighted copy of the PBE Site

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	Stabilising stockpiles, establishing appropriate sediment controls and suppressing dust as required.			Management Plan dated October 2022 which notes where possible any surface run-off will be diverted away from disturbed soil & stockpiles and ensure location of spoil is away from drainage lines with installed sediment fencing on the down slope of stockpiles, re-use topsoil where possible and stockpile separately. The site audit confirmed that erosion and sediment controls are in place for Project construction areas, however some erosion and sediment controls required maintenance at the time of the site inspection, see Plate 1 and Plate 2. It is recommended that regular inspections and maintenance are completed on all erosion and sediment controls prior to disturbed areas being stabilised with vegetation cover. Stage 2 Section 5 of the Stage 2 Soil and Water Management Sub Plan notes that Stockpiles will be managed to minimise

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				the potential for mobilisation and transport of dust, sediment and leachate in runoff. Viewed cover crop applied to Stage 2 stockpiles and sediment fencing established to prevent mobilisation.
W4	Erosion and sediment control measures will be implemented and maintained at all work sites in accordance with the principles and requirements in Managing Urban Stormwater – Soils and Construction, Volume 1 (Landcom, 2004) and Volume 2D commonly referred to as the “Blue Book” where appropriate. Additionally, any water collected from worksites will be treated and discharged (where able) to avoid any potential contamination or local storm water impacts. Measures will be designed in accordance with the relevant guideline where appropriate.	Construction	C	The site inspection confirmed that sediment and erosion control measures have generally been implemented within Project construction areas, see Plate 1 and Plate 16 . It is recommended that erosion and sediment controls are regularly inspected and maintained if required.
W5	Water use during construction will be minimised where possible and measures to reduce water use will be applied.	Construction	C	Stage 1 HC (pers comms) confirmed that there is no major water demand for Stage 1 of the Project. Section 4.2.1 of Stage 2 WMP notes that during construction, water would be required for activities such as dust suppression, drilling, concrete works and revegetation. Water would be sourced from existing onsite sources in accordance

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				with existing water allocations. No new potable water connections would be required, and no surface water would be abstracted during construction of the Project. Stage 2 KS (pers comms) confirmed that water use for Stage 2 is predominantly for water cart dust suppression, although this is minimal demand in the context site approvals.
W6	The Bayswater site operational water quality monitoring program will be updated and implemented as required.	Pre-operation and operation	C	The EMS notes that surface discharges must comply with volume and quality limits set in the site Environment Protection Licence. KS (pers comms) confirmed that water quality monitoring for the EPL is available on the website. Sighted copy of Monthly Data Summary EPL 2122 report for start of month 1 May 2023 which includes water quality monitoring. Sighted copy of Monthly Data Summary EPL 2122 report for start of month 1 December 2023 which includes water quality

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				monitoring/
Social and economic				
SE1	AGLM will keep the community and stakeholders updated on the Project via the existing community engagement forum and AGL website	Pre-construction	C	HC (pers comms) confirmed that the community and stakeholders are updated on the Project via Community Dialogue meetings. It is recommended that updates on the Project are provided via the AGLM website and that community dialogue meeting minutes are available. The AGLM website provides a Project overview and copies of environmental approvals and management documents.
SE2	Identify opportunities to maximise the use of local suppliers, labour and businesses in the provision of goods and services for construction.	Construction	C	Stage 1 HC (pers comms) confirmed that AGLM use local sub-contractors to perform Project work. Sighted examples of tax invoices from local suppliers during the audit period, including Bretts Maintenance and Welding. Bretts Maintenance and Welding Tax Invoice number 00005660, dated 31 August 2023.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Stage 2 KS (pers comms) confirmed that AGLM use local sub-contractors to perform Project work, although no evidence was available at the time of the audit for Stage 2. It is recommended that evidence is retained to confirm the use of local suppliers, labour and businesses in the provision of goods and services is considered in the tender process for future construction phases of the Project.
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.	Construction	C	KS (pers comms) confirmed that there has been consultation with local tourist accommodation providers during the audit period. Sighted copy of AGLM tourist providers survey record document ref: 231017 Tourist providers which provides a list of accommodation plus notes general feedback that the summer months are the busiest for tourist traffic and they do get longer term accommodation when the mines are busier and there

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				are construction Project s going on.
Infrastructure				
I1	AGLM will continue to consult with TransGrid and ETMC regarding any perceived impacts on the Liddell switchyard.	Pre- construction	C	HC and KS (pers comms) confirmed that AGLM will continue to consult with TransGrid and ETMC regarding any perceived impacts on the Liddell switchyard. AGLM subsequently provided the Liddell 330kV Substation Safety in Design Report LD1-600023 dated 12 April 2023, as prepared by TransGrid. The report documents the TransGrid safety in design and risk assessment process for the Liddell Decoupling Project.
I2	AGLM will consult with Ausgrid as the network provider responsible for other onsite supply regarding continued supply.	Pre- construction / construction	C	Stage 1 Sighted email from AGLM site Co-ordinator HV Decoupling Project that notes AGLM did not communicate directly with AusGrid, although established a decoupling Project commissioning review meeting with the key stakeholders ensuring that continuity of supply was maintained throughout the execution of work. The email

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				also notes that separate meetings were held with TransGrid and PBE. An agreed co-ordinated test plan was in place for testing over boundaries to ensure all stakeholders were consulted and advised as to their respective roles in the successful realisation of the Project. Sighted copy of Decoupling Project Commissioning Review Meeting Minutes for meeting held 14 November 2023. Attendees included both PBE, AGLM and TransGrid employees. Stage 2 Not triggered for Stage 2.
Cumulative				
CL1	The CEMP will include a process to review and update management measures if any other development commences in proximity to the Project.	Pre-construction	NT	HC (pers comms) confirmed that AGLM have implemented a process to review and update management plans for each stage of the Project prior to commencement, in consultation with DPHI. It is recommended that a process to review and update management measures if any other development commences

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				in proximity to the Project is included within the EMS.

APPENDIX D

STAKEHOLDER ENGAGEMENT

CORRESPONDENCE

From: [Theresa Folpp](#)
To: [Tegan Anne Brown](#)
Cc: [Sharon Pope](#); [Dorian Walsh](#)
Subject: RE: Liddell Battery and Ancillary Works Project SSD 8889679 Audit - Consultation
Date: Tuesday, 30 January 2024 4:20:07 PM
Attachments:

[WARNING] This email originated from outside of the organisation.

Hi Tegan,

Thank you for the opportunity to provide input to the IEA.

The previous two IEA Reports are quite comprehensive, as such, please find minor comments following.:

- Could you review water management, erosion / sediment control and waste management (including waste classification). Staff are particularly interested in how AGL are tracking against the recommendations made in the Stage 2 IEA in relation to waste management.
- Please also include a review of Aboriginal Heritage, where relevant for Stage 3.
- Could you request AGL update the 'Independent Audit Response Letter' on its website, to indicate which IEA the response is for.

Regards,
Theresa



Muswellbrook Shire Council | Theresa Folpp | Development Compliance Officer | Available Tue - Fri

T: 02 6549 3700 I

I respectfully acknowledge the local Aboriginal people who are the Traditional Owners and Custodians of the land on which I work
Please consider the environment before printing this email



DOC24/34697-1

JAMES BAILEY & ASSOCIATES
PO BOX 517
MUSWELLBROOK NSW 2333

By email: tbrown@baileyassociates.com.au

18 January 2024

Dear Tegan Brown

**Liddell Battery and Ancillary Works Project
Independent Environmental Audit**

Thank you for the request on 17 January 2024 requesting input from the NSW Environment Protection Authority (EPA) on the Independent Environmental Audit of the Liddell Battery and Ancillary Works Project (SSD-8889679).

The EPA encourages the preparation and implementation of audits, strategies, programs and plans. They are useful tools for industry to determine how they will meet their statutory obligations and designated environmental objectives.

Being a regulatory authority, the EPA's role is to administer and regulate statutes for environmental management and protection. As such the EPA does not directly get involved in the development of strategies or carrying out of audits to achieve those objectives and does not review or comment on such documents.

Accordingly, the EPA offers no comments on the environmental audit.

If you have any further questions about this issue, please contact Bree Turkington on (02) 8275 1550 or info@epa.nsw.gov.au.

Yours sincerely

ADAM PLANT
A/Unit Head - Operations

Phone 131 555
Phone 02 9995 5555
(from outside NSW)

TTY 133 677, then
ask for 131 155

Locked Bag 5022
PARRAMATTA
NSW 2124

6&8 Parramatta
Square 10 Darcy
Street
PARRAMATTA NSW
2150

info@epa.nsw.gov.au
www.epa.nsw.gov.au
ABN 43 692 285 758

APPENDIX E

IEA SITE VISIT AGENDA

AGL Macquarie
Department of Planning, Housing and Infrastructure
Phase 3 Construction Independent Environmental Audit for
Bayswater Power Station Upgrade Project (SSD 8889679)

Agenda for Site Visit held
Tuesday 16th January 2024

INVITEES:

Hardiksinh Chavda (HC)	AGL	Environmental Advisor
James McNamara (JM)	AGL	Senior Environment Advisor
Keith Simkin (KS)	AGL	Environment Scientist, Contractor
Alexander Ristoski (AR)	AGL	Environment Scientist, Contractor
Dorian Walsh (DW)	James Bailey & Associates	Auditor
Tegan Brown (TB)	James Bailey & Associates	Auditor

Table 1
Audit Agenda Items

Time	Description	Location	Attendees
8:00 – 9:00am	Opening Meeting - Inductions / housekeeping (HC) - IEA scope and purpose (DW) - Confidentiality arrangements (DW) - IEA process and timing (DW) - Brief overview of site during the audit period (HC) - Discussion on SSD 8889679 Stage 2 requirements	Meeting Room	HC, JM, AR, KS DW, TB
9:00am – 12:00pm	Compliance Review - SSD 8889679 conditions and statement of commitments - EA, management plan commitments - Site Procedures	Meeting Room	HC, AR, DW, TB
12:00 – 12:30pm	Lunch		

Time	Description	Location	Attendees
12:30 - 2:00pm	Site Inspection - Review of environmental controls: - Amenity Management - Erosion and sediment controls - Laydown areas and storages	Field	HC, AR, DW, TB
2:00 – 2:30	Compliance Review (continued) - Licencing review - Review of any remaining compliance documents - JBA prepare preliminary findings	Meeting Room	HC, AR, DW, TB
2:30 – 3:00 (TBC)	Close Out Meeting - Overview of preliminary findings - Outstanding information requirements - Confirmation of process for audit completion	Meeting Room	HC, AR, DW, TB

APPENDIX F

SITE INSPECTION PLATES

STAGE 1 PLATES



Plate 1 Sediment fencing requiring maintenance on the Stage 1 site while ground cover develops



Plate 2 Stage 1 sediment fencing that requires maintenance while stockpile is exposed



Plate 3 Erosion and sediment control measures available on the Stage 1 site



Plate 4 Erosion and sediment control measures available on the Stage 1 site and some exposed areas requiring reseeding



Plate 5 General waste skip bins available at the Stage 1 site



Plate 6 Stage 1 transformers with bunding available to capture any spills



Plate 7 Lighting at Stage 1 facility positioned facing below horizontal



Plate 8 Speed limit signage available on site



Plate 9 Stage 1 stockpile which requires delineation and reseeding



Plate 10 Stage 1 Project area, with low dust emissions. Permanent infrastructure is clad to minimise visual contrast.

STAGE 2 PLATES



Plate 11 Locked gate and fencing surrounding the Stage 2 site



Plate 12 Sediment fencing and boundary flagging to delineate the Stage 2 site



Plate 13 Vegetation stockpile located within the Stage 2 site



Plate 14 Stockpiles located within the Stage 2 site



Plate 15 Stockpile of potentially contaminated material within the Stage 2 site (awaiting further assessment at the time of audit)



Plate 16 Sediment fencing available within the Stage 2 site used to define clearing area



Plate 17 Stage 2 site which has been seeded to minimise exposed areas¹³



Plate 18 Areas of weeds within the Stage 2 site boundary that require treatment