

INDEPENDENT ENVIRONMENTAL AUDIT REPORT
West Wyalong Solar Farm - SSD 9504 - Mod 1
Lightsource BP Pty Ltd

30 November 2021



Independent Environmental Audit – West Wyalong Solar Farm

Executive Summary

J2M Systems Pty Ltd was engaged by Lightsourcebp Pty Ltd (LSbp) to undertake an independent environmental audit (IEA) at the West Wyalong Solar Farm ('the Project') in accordance with Schedule 4, Condition 6 of the NSW Department of Planning, Infrastructure and Environment (NSW DPIE) Development Consent SSD 9504 ('Development Consent'). Development Consent was granted on 28 November 2019 and has been modified on one occasion at the date of this audit, being SSD 9504 Modification 1, approved 27 September 2021.

The Development Consent, which is the scope of this audit, includes conditions for construction, operation, upgrading and decommissioning of a 90megawatt (MW) photovoltaic (PV) energy generation facility and associated infrastructure, including grid connection and battery storage at West Wyalong, central west New South Wales (NSW). The project is located on a 562hectare (ha) site approximately 17 kilometres (km) north-east of West Wyalong, between Blands Lane and Myers Lane within the Bland Shire Council Local Government Area (LGA).

The Project commenced construction on 07 August 2021. The Project proponent is LSbp and the contractor responsible for construction of the Project is PCL Constructors Pacific Rim Pty Ltd (PCL).

In accordance with Schedule 4, Condition 6 of the Development Consent, J2M Systems was formally commissioned by LSbp on 09 July 2021 to carry out this IEA of the West Wyalong Solar Farm, being the first IEA on the project and within three months of commencement of construction. The auditor was approved by NSW Department of Planning, Industry and Environment (NSW DPIE) in correspondence dated 16 August 2021.

The audit methodology included:

- Audit planning discussion with LSbp representatives with regard to audit timing, provision of documentation, site visits and personnel involvement.
- Review of audit documentation provided by LSbp and its representatives.
- Consultation with relevant Government agencies, Registered Aboriginal Parties and the key stakeholders as identified by LSBP and NSW DPIE.
- Site inspection undertaken Wednesday 20 – Friday 22 October 2020.
- Review of additional audit documentation provided by LSbp and its representatives during and after the audit site inspection via email submission between 22 October and 05 November 2021.
- Submission of draft report to LSBP 08 November 2021 for review of adequacy and as an opportunity for LSBP to confirm findings and/or provide additional information.
- Finalisation of report on Tuesday 30 November 2021.

The audit scope assessed compliance with the Development Consent and management plans applicable to the Project at the time of the audit. A detailed audit table is presented in Appendix A identifying audit evidence, findings and recommendations. Section 3 of this report presents the audit findings, including an assessment of the adequacy of management plans and summary of environmental performance. Section 4 of this report presents non-compliances and auditor recommendations identified against the audit scope.

Following completion of this IEA, there were three (3) non-compliances identified against fifty-seven (57) conditions of the Development Consent, as well as two (2) self-reported non-compliances in relation to one reportable incident on site. Seven (7) opportunities for improvement were also identified. Overall, the Project's actual impacts appear generally consistent with those predicted in the Environmental Impact Statement and are generally controlled through the Development Consent Conditions.

Document Revision Record

Issue No.	Date	Details of Revision
Draft	08 November 2021	Draft issued for comment.
Rev 0	30 November 2021	Final

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LIMITATIONS:

This report has been prepared in accordance with NSW Department of Planning, Industry and Environment requirements and guidelines. The findings of this audit are based upon visual observations of the site, interviews with site personnel and our interpretation of documentation made available by Project personnel. Opinions presented herein apply to the site as observed at the times of the inspections and from the Auditors interpretation of documentation and information provided by Project personnel. Any changes to this information of which the Auditor is not aware and has not had the opportunity to evaluate therefore cannot be considered in this report.

J2M Systems have taken due care to consider all reasonably available information provided during the undertaking of this audit and have taken this information to represent a fair and reasonable characterisation of the environmental status of the site, but recognise that any site assessment program is necessarily limited in scope and true site conditions may differ from those inferred from the available data.

This document has been prepared on behalf of, and for the exclusive use of J2M Systems' client, and is subject to, and issued in accordance with, the provisions of the contract between J2M Systems and the client. J2M Systems accepts no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this document by any third party.

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1 Introduction:

1.1 Project Background

J2M Systems Pty Ltd was engaged by Lightsource BP (LSBP) to undertake an independent environmental audit (IEA) on the West Wyalong Solar Farm (referred to as the 'Project') in accordance with Schedule 4, Condition 6 of the NSW Department of Planning, Infrastructure and Environment (NSW DPIE) Development Consent SSD 9504 Modification 1 (Development Consent).

Urbis Pty Ltd prepared an Environmental Impact Assessment (EIS) for the project, which provides the context for the project and identifies and assessed the environmental issues associated with construction and operations of the solar farm. The EIS is available on the project website at the time of this audit.

Development Consent was granted on 28 November 2019 and has been modified on one occasion as at the date of this audit, being MOD 1 dated 27 September 2021. The Development Consent, which is the scope of this audit, includes conditions for construction, operation, upgrade and decommissioning of a 90 MW AC PV solar farm at West Wyalong. The site is located approximately 15.8kms north-east of the West Wyalong town centre on the south-east side of Blands Lane. The site is situated within the Bland Shire Council Local Government Area (LGA).

The Project commenced construction on 07 August 2021. The Project proponent is LSbp and the engineer, procure and construct contractor (EPC Contractor) responsible for construction of the Project is PCL Constructors Pacific Rim Pty Ltd (PCL).

1.2 Scope of Work

The frequency of the independent environmental audit is pre-determined by Schedule 4, Condition 6 of the Development Consent, and is reproduced here:

The audits must be prepared in accordance with the relevant Independent Audit Post Approval requirements (DPE 2020) to the following frequency

- a) within 3 months of commencing construction;
- b) within 3 months of commencement of operations.

The scope of the audit is also defined in Section 3.3 of the Independent Audit Post Approval Requirements (DPE 2020), and is reproduced here:

An Independent Audit must include:

- 1) *an assessment of compliance with:*
 - a) *all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2;*
 - b) *all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and*
- 2) *a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:*
 - a) *actual impacts compared to predicted impacts documented in the environmental impact assessment;*
 - b) *the physical extent of the development in comparison with the approved boundary;*
 - c) *incidents, non-compliances and complaints that occurred or were made during the audit period;*

- d) *the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and*
 - e) *feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;*
- 3) *the status of implementation of previous Independent Audit findings, recommendations and actions (if any);*
- 4) *a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and*
- 5) *any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.*

The criteria of the audit included the requirements of:

- Works undertaken since Project Approval (28 November 2019) to completion of the audit site inspection 22 October 2021.
- the Development Consent (Appendix A – Audit Table);
- strategies/management Plans/programs required by the Development Consent conditions during the construction phase, being:
 - Construction Environmental Management Strategy;
 - Biodiversity Management Plan;
 - Heritage Management Plan;
 - Traffic Management Plan;
 - Landscaping Plan; and
 - Accommodation and Employment Strategy.

1.3 Audit Period

The audit period is defined as the period between approval and issue of Development Consent, 28 November 2021 to completion of the audit site inspection 22 October 2021. This IEA has been completed the period of three (3) months from the commencement of construction, reported as 07 August 2021, which is consistent with the requirements of Development Consent SSD 9504 Schedule 4, Condition 6.

1.4 Audit Team

In accordance Section 3.1 of the NSW DPIE Independent Audit Post Approval Requirements, this audit was completed by Peter Marshman of J2M Systems Pty Ltd. NSW DPIE approval of the auditor is provided within Appendix B of this report. No technical specialists were required for this audit. The Auditor's deceleration of independence is provided within Appendix D of this report.

1.5 Methodology

1.5.1 Document review

Preparation for the IEA involved desktop reviews of documentation identified in the scope of this audit (Refer to Section 1.2), including relevant plans/programs/statutory requirements. An audit checklist was developed as part this review (Appendix A – Audit Table). An adequacy assessment of plans and programs required under the consent is provided in Section 3.5 of this report.

The Auditor is a general environmental management systems auditor and is not a technical expert across any or all of the management plans reviewed. The high-level review of adequacy of the management plans is determined by:

- review of the plan(s) against the relevant development of approval requirements;
- considering that the plan(s) have been reviewed and approved by relevant agencies; and
- considering the environmental performance of the project with regard to the content and currency of the plan(s).

A technical review is not included and this is assumed to have been done in the development of the plan(s), in consultation with relevant Agencies, and through the relevant approval processes.

1.5.2 Opening and Closing Meeting

An opening meeting was held on Wednesday 20 October 2021 to introduce the auditor to the Project management team and to outline the audit process and confirm audit arrangements.

An interim closing meeting was held on Friday 22 October 2021 to provide a summary of audit findings at the time, noting that further review of evidence was required prior to finalising audit findings.

The issue of the draft report is considered as the close of the audit.

Audit attendance at the opening and closing meeting is summarised in Table 1 below.

Table 1: Audit attendance

Name	Title - Organisation	Opening Meeting	Closing Meeting
Diana Mitchell	LSbp Principal Environmental Planner	Yes	Yes
Georgia King	LSbp Environmental Planner	Yes	Yes
Donnacha Culloo	LSbp Senior Project Manager	Yes	Yes, via phone
Glenn Tilley	LSbp Site Manager	Yes	Yes
Landon Doulgas	PCL Project Manager	Yes, via phone	Yes, via phone
Hesham Shehata	PCL Site Manager	Yes	Yes
Paul Cannington	PCL HSE Manager	Yes, via phone	Yes, via phone
Nicholas Smudja	PCL Project Coordinator	Yes	Yes
Latifa Karimi	PCL Project Coordinator	Yes	Yes
Jennifer Klease	PCL Safety Advisor	Yes	Yes
Dale Walton	PCL Safety Advisor	Yes	Yes

1.5.3 Site inspection and Interviews

Site inspection and interviews were undertaken by Peter Marshman on 20 – 22 October 2021. The purpose of the site inspection and interviews was to discuss and obtain evidence supporting the compliance status of the project with relevant site personnel, view environmental management records, view existing on-site environmental controls and observe general environmental performance.

The audit site inspection included inspection of all active work areas at the time of the audit, as well as aboriginal heritage locations and environmental protection zones. Outcomes of the site inspection is provided in Section 3.8.

1.5.4 Reporting

The audit report was developed between 20 October 2020 and 05 November 2021. A draft report was provided to LSBP via email dated 08 November 2021. Following receipt of comments on the draft report, this audit report was finalised on 30 November 2021. Other than minor administrative corrections, no changes were made to the final report.

1.5.5 Compliance Status Descriptors

The compliance status of each compliance requirement in the Audit Table (Appendix A) has been determined using the relevant descriptors in Table 2 below as required by the NSW DPE Independent Audit Post Approval Requirements, June 2020.

Table 2: Compliance Status Descriptors

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

2 Independent Audit Scope Development and Consultation with Relevant Agencies

In accordance with the NSW DPIE *Independent Audit Post Approval Requirements* (June 2018), J2M Systems undertook consultation with the following stakeholders to establish the scope of the audit and gain an understanding of their interests in the Project and its environmental performance:

- NSW Department of Planning, Industry and Environment (NSW DPIE)
- Bland Shire Council
- Transport for NSW (TfNSW)
- DPIE Biodiversity and Conservation Division (BCD)
- Heritage NSW
- NSW Environmental Protection Authority (NSW EPA)
- Registered Aboriginal Party (RAP) - West Wyalong Local Aboriginal Land Council
- RAP - Young Local Aboriginal Land Council

Notification of a request for consultation and scope development was issued via official agency portals and/or emails dated 17 September 2021. The following sections provide a summary of feedback received. Record of the correspondence received via email is provided Appendix C.

2.1 NSW Department of Planning, Industry and Environment (NSW DPIE)

Katrina O'Reilly, Team Leader Compliance for NSW DPIE Planning and Assessment provide an email response, dated 09 September 2021, outlining that the audit should apply the revised 2020 Independent Audit Post Approval Requirements and conformed the following agencies were to be consulted:

- Bland Shire Council
- TfNSW
- DPIE Biodiversity and Conservation Division (BCD)
- Heritage NSW
- RAP - West Wyalong Local Aboriginal Land Council
- RAP – Young Local Aboriginal Land Council.

Auditor response: This IEA has been completed in accordance with the 2020 Independent Audit Post Approval Requirements and each of the above stakeholders were contacted via email and provided with the opportunity to engage in development of the audit scope.

2.2 Bland Shire Council

Bland Shire Council provided an automated email response via the Council Record email (dated 17 September 2021) acknowledging receipt of the initial scope request email and indicated that it will be allocate it to the relevant department for review and response. No further correspondence was received.

2.3 Transport for NSW (TfNSW)

No correspondence was received form TfNSW.

2.4 DPIE Biodiversity and Conservation Division (BCD)

Andrew Fisher, Senior Team Leader, Planning – South West, provided correspondence dated 30 September 2021, requesting the audit consider the following items:

Actions in the Biodiversity Management Plan:

- It is important that the actions listed in Tables 4-1 and 4-2 have been implemented where they have been required.
 - **Auditor response:** Environmental protection measures listed in Tables 4-1 and 4-2 were generally observed implemented during the audit site inspection, including no-go zones, sediment and erosion control, inspection of work areas. However, based on the reported incident (Refer to Section 3.4.1 below), the ecologist was not present during all vegetation clearing on site, no-go zones were not established prior to clearing commencing, and vegetation clearing was not monitored to ensure compliance which is not consistent with the mitigation measures provided within Table 4-1.

Opportunity for Improvement No 1: LSbp and PCL must ensure the requirements of the Biodiversity Management Plan are implemented for all future clearing on site, if any.

Vegetation Clearing

- The clearing of native vegetation along Myers Lane must be conducted in accordance with Table 4-1 and the appropriate protocols listed within and at Section 5-Management Protocols.
 - **Auditor comment:** No vegetation clearing had occurred within/along Myers Lane at the time of this audit. Vegetation clearing had occurred within the development area, but not along the Myers Lane transmission line.
- The clearing of 32 paddock trees, including 11 habitat trees, must only be conducted in accordance with Table 4-1 and the appropriate protocols listed within and at Section 5-Management Protocols.
 - **Auditor comment:** Dr Sean Graham, Ecologist with OzArk Environment and Heritage Pty prepared a report dated 09 September 2021 RE: Supervision of habitat tree clearing for West Wyalong Solar Farm. The clearing of clearing of 11 habitat trees appears to have been conducted in accordance with Table 4-1 and the appropriate protocols listed within and at Section 5 - Management Protocols. However, based on the reported incident (Refer to Section 3.4.1 below), the ecologist was not present during all vegetation clearing on site and no-go zones were not established prior to clearing commencing, which is not consistent with the mitigation measures provided within Table 4-1 and the Protocols 12 and 13 of the Biodiversity Management Plan.

Opportunity for Improvement No 1: LSbp and PCL must ensure the requirements of the Biodiversity Management Plan are implemented for all future clearing on site, if any.

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- BCD's review of the Modification Application - Schedule 3 Condition 5 Road Upgrades and Site Access (determined on 22 September 2021) indicated that proposed upgrade to the Bodells Lane / Newell Highway intersection may require the clearance of native vegetation along both roads. The audit should consider if this has been adequately assessed and whether appropriate protocols are in place for this work.
 - **Auditor comment:** NSW DPIE undertook a State Significant Development Modification Assessment of the West Wyalong Solar Farm Modification 1, report dated September 2021, assessing the proposed modification in accordance with the relevant matters for consideration under the *Environmental Planning and Assessment Act* (EP&A Act). The

Department determined that the modification would not result in any significant impacts beyond those that were assessed and approved under the existing consent.

Additionally Andrew Fisher also provided an email dated 20 September 2021, requesting the auditor seek comment in relation to Aboriginal cultural heritage from Heritage NSW at heritagemailbox@environment.nsw.gov.au

- **Auditor comment:** Heritage NSW were emailed during the initial consultation period (17 September 2021) via heritagemailbox@environment.nsw.gov.au. No response received.

2.5 Heritage NSW

No return correspondence was received from Heritage NSW.

2.6 NSE EPA

The NSW Environment Protection Authority (EPA) provided an automated email response via the Environment Line (dated 17 September 2021) stating that a response to requests and enquiries will be provided within 5 working days. No further correspondence was received.

2.7 West Wyalong Local Aboriginal Land Council

Linton Howarth, CEO for West Wyalong Local Aboriginal Land Council, was additionally contacted via telephone on 05 October 2021 and provided general comments with regard to the project and confirm that:

- An incident involving aboriginal heritage items had been reported (Bee Tree Incident – Refer to Section 3.4.1) and the LSbp were positive and cooperating in incident investigations and correction actions.
- Aboriginal heritage induction for key site personnel had been delayed due to Covid restrictions.

2.8 Young Local Aboriginal Land Council

Norma Freeman, CEO of Young Local Aboriginal Land Council provided an email response dated 17 September 2021 indicating that whilst being a RAP on this project it would be inappropriate to comment having not been on the site. Norma recommended the Auditor to make contact with West Wyalong LALC (Linton Howarth) CEO. This was achieved via email, refer above.

3 Audit Findings

3.1 Approval and Documents Audited

The following primary documentation was considered as part of this IEA:

- Development Consent for SSD 9504 as modified Mod 1, 27 September 2021;
- Environmental Management Strategy;
- Biodiversity Management Plan;
- Heritage Management Plan;
- Traffic Management Plan;
- Landscaping Plan;
- Accommodation and Employment Strategy;
- Final Layout Plans;
- Construction Environmental Management Plan; and
- Site Specific Health & Safety Plan.

In accordance with Schedule 4, Condition C6 (d) of the Consent, the following sections provide an assessment of the project's compliance with relevant conditions of the Development Consent, and relevant strategies, plans or programs required under the Development Consent.

3.2 Compliance Performance

This audit is considered to address the requirement of the scope of works to '*assess the environmental performance of the project*'. Section 4 of this report lists the conditions considered to be non-compliant, whilst the Audit Table (Appendix A) provides an assessment of the project's compliance with relevant conditions of the Development Consent, and associated strategies, plans and programs required under the Development Consent.

Site environmental controls were observed as being implemented on site generally in accordance with the measures stipulated in the approved management plans and development approval. No environmental issues were identified during the audit site inspection.

3.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

The LSbp Principal Environmental Planner and PCL Construction Manager reported that following 'Show Cause' notifications had been received at the date of this audit:

- NSW DPIE West Wyalong Solar Farm (SSD 9504) - Show Cause notice issued to LSbp, 21 September 2021. The Department alleges that Lightsource Development Services Australia Pty Ltd breached Section 4.2(1)(b) of the Act by failing to comply with Schedule 3, Condition 19 and 20 of Consent SSD 9504 for the West Wyalong Solar Farm. Representations were requested to be received no later than COB 06 October 2021.

Status: LSbp responded to NSW DPIE via correspondence dated 06 October 2021.

- NSW DPIE West Wyalong Solar Farm (SSD 9504) - Show Cause Notice issued to PCL, 11 October 2021. The Department alleges that PCL Constructor Pacific Rim Pty Ltd breached Section 4.2(1)(b) of the Act by failing to comply with Schedule 3, Condition 19 and 20 of Consent SSD 9504 (the Consent) for the West Wyalong Solar Farm (the development). Representations were requested to be received no later than COB 25 October 2021.

Status: LSbp's Environmental Planner reported (via email dated 04 November 2021) that NSW DPIE granted PC a two (2) week extension, with a response now due 08 November 2021.

3.4 Summary of Environmental Incidents

The PCL Safety Advisor and PCL Construction Manager reported that one reportable environmental incident had occurred on the project, which has been reported to the relevant agencies in accordance with the requirement the Development Consent. This incident will be discussed further below in s.3.4.1.

The Auditor was advised that with the exception of some minor spills of hydraulic fluid on site, there were no other environmental incidents identified by or reported to the site team. Minor spills are considered to be spills of low volume (i.e. less than 20L), fully contained on site, did not cause or threaten material harm to the environment and were immediately and fully cleaned on site.

3.4.1 Reportable incident

Bee tree / Aboriginal Heritage Items incident

The proponent self-reported an environmental incident which occurred on 23 August 2021 where a direct impact has occurred to an Aboriginal heritage item identified in Table 1 of Appendix 3 of the Development Consent, namely a WWSF Bee Tree, AHIMS number 43-4-0058, identified as a scarred tree and disturbance to artefact scatter AHIMS ID 43-4-0057 which is located in the in the area surrounding the Bee Tree.

Whilst completing tree clearing operations of non-habitat trees the Bee Tree, which is identified as culturally sensitive and is protected has been incorrectly identified for removal and as a result has been felled. The tree has sustained extensive damage to the bark on one side, a number of branches have been broken away and the root system has been damaged.

PCL prepared a Bee Tree Incident Investigation Report, dated 06/09/2021, which outlines details of the incident, the events leading up to the incident, events undertaken post incident and key findings and recommendations. A Rehabilitation Management Plan for "Bee Tree" *Belah Casuarina cristata* prepared by Project Arborist Tony Manus following the incident. The recommendations in this report were observed to have been implemented by the project team.

Disturbance to artefact scatter (AHIMS ID 43-4-0057) occurred both during the initial clearing activity and in the subsequent incident corrective action activity.

Status: At the time of this audit, NSW DPIE, Heritage NSW and West Wyalong LALC are investigating the incident and the outcome of this investigation is still pending.

3.5 Summary of Environmental Complaints

LSBP maintains a feedback register and this was provided for review during the audit. The following four (4) complaints were recorded as at the time of this audit:

- **WWSF Complaint 01:** 20/07/2021 complaint by local resident who could not use intersection due to road closure.
 - Follow-up Action: PCL Construction Manager and PCL Safety Advisor met with resident 21/07/2021 and discussed access arrangements, including the PCL Construction Manager personally escorting the resident where required. Status: Considered closed by project team.
- **WWSF Complaint 02:** 03/08/2021 Plant deliveries being completed on a Sunday.
 - Follow-up Action: This was considered an informal notification received from Bland Shire Council. Follow-up investigation by PCL Construction Manager identified that two heavy vehicles were involved in the delivery of a road grader and bulldozer for the road upgrade works. The PCL Construction Manager considered this to be activities that are inaudible at non-associated receivers (thus allowed under the Consent Conditions), however following

receipt of the complaint a direction was given for no deliveries / construction activities on Sundays. Status: Considered closed by project team.

- **WWSF Compliant 03:** 03/08/2021 Complaint to Bland Shire Council RE: heavy vehicles travelling along Bodells Lane whilst the road was closed to traffic.
 - Follow-up Action: The PCL Construction Manager investigated this complaint and heavy vehicle movements were part of the road upgrade works. Status: Under investigation.
- **WWSF Compliant 04:** 22/09/2021 Wire fence damaged – Blands Lane.
 - Follow-up Action: PCL Construction manager met with landowner (22/09/2021) agreed to reinstate the fence. This had not yet been completed but is being managed by the PCL Construction Manager. Status: Considered closed by project team.

3.6 Review of Adequacy of Project Management Plans

The Development Consent requires the preparation, Secretary approval and implementation of a series of strategies and management plans. Based on this requirement, the following relevant strategies and management plans were reviewed during this Audit, including:

- Environmental Management Strategy
- Construction Environmental Management Plan
- Accommodation and Employment Strategy
- Biodiversity Management Plan
- Heritage Management Plan
- Landscaping Plan
- Traffic Management Plan

As set out in Section 1.5.1, this is a high-level review of adequacy of the management plans and a technical review was not undertaken as this is assumed to have been done in the development of the plan, in consultation with relevant Agencies, and through the relevant approval processes. A summary of the adequacy assessment of each strategy or management plan is provided below.

3.6.1 Environmental Management Strategy

An Environmental Management Strategy (EMS) was prepared and approved by the Secretary one (1) year prior to commencement of construction. The EMS was updated as required by the Secretary 12 days prior to commencement of construction. The current EMS, Revision 2.0 was available on the project website at the time of this audit, as well as being available on site.

The EMS sets out the strategic framework for environmental management on the project and includes details on applicable legal and other requirements, roles and responsibilities for key environmental management personnel, internal and external communication, environmental incident response and processes for environmental monitoring and complaint management, in accordance with the relevant Conditions of Consent.

The EMS is considered a concise and interpretable document that includes requirements for the development and implementation of a Construction Environmental Management Plan, as well as an Operational Environmental Management Plan.

Evidence was available to generally support the implementation of the EMS on site, including:

- Supporting management plans available on site.
- Records of site inductions
- Records of toolbox talks
- Records of daily pre-start meetings
- Records of site inspections.

- Records of complaints/enquiries.
- Record relating to recent incident.

Given the recent preparation and approval of the EMS, it is considered adequate for the transfer to project specific information, accountabilities and control of project requirements, with the following opportunity for improvement identified:

- **Opportunity for Improvement No.1:** In accordance with the Development Consent (Schedule 4, Condition 2), the Environmental Management Strategy and supporting management plans, including the Construction Environmental Management Plan, require review, and if necessary revision to the satisfaction of the Secretary, to address the outcomes of the reportable incident and to address relevant changes to the Development Consent following approval of Modification 1 in accordance with Schedule 4, Condition 2 of the Development Consent.

3.6.2 Construction Environmental Management Plan

PCL has prepared an additional Site Health Safety and Environment (HSE) Plan for implementation throughout the construction phase of the project. The plan includes project specific information which is generally considered adequate; however its interpretation and subsequent implementation effectiveness could be improved by undertaken a critical review of the CEMP with the aim of streamlining and simplifying the content.

The HSE Plan has been inconsistently implemented on site, with requirements such as environmental risk register and project environmental checklist not being completed and regular site environmental inspections being completed following a different process than that described in the HSE Plan (i.e. using a different checklist to the one nominated in the HSE Plan). The site risk register provided for review during the audit did not identify or assesses environmental aspects and impacts.

Whilst site inspections are occurring on site, the completion of these is ad-hoc and the forms used for the inspections are inconsistent and/or informal. Inspection records were provided for October, however construction commenced in early August 2021.

A non-conformance (under Development Consent Schedule 4, Condition 1) was identified in relation to the overall implementation of the CEMP to date on the project, with the following recommendations:

- **Non-compliance - Auditor Recommendation:** A detailed internal audit be promptly undertaken on the PCL HSE plan (as required by the CEMP) to verify the statements and procedures within the HSE Plan, verify implementation and to identify areas to streamline content to enable better interpretation and effective implementation on site.
- **Non-compliance - Auditor Recommendation:** The project risk register be reviewed and revised to adequately identify and assesses environmental aspects and impacts.
- **Non-compliance - Auditor Recommendation:** The implementation of the existing CEMP could be improved by establishing one concise monitoring and accountabilities schedule depicting all the relevant inspections, monitoring and reporting requirements as outlined within all project management plans, including frequency, type, person responsible, method/form, record(s) to be maintained and reporting requirements.
- **Non-compliance - Auditor Recommendation:** There are currently 2 mobile plant registers being maintained and it is recommended these be consolidated into one register covering all plant and equipment on site, and that any identified gaps in on-boarding documentation, such as most recent maintenance records, be promptly rectified.

3.6.3 Accommodation and Employment Strategy

An Accommodation and Employment Strategy has been prepared, in consultation with Bland Shire Council, and approved by the Secretary one year prior to the commencement of construction. The Accommodation and Employment Strategy generally meets the documentation requirements of the Development Consent (Schedule 3, Condition 29) and appears implemented on the project. Local contractors have been engaged to undertake road upgrade works and cleaning services on the project. Local hotel accommodation is being utilised by the project team, including the auditor. No opportunities for improvement were identified.

3.6.4 Biodiversity Management Plan

A Biodiversity Management Plan (BMP) has been prepared, in consultation with BCS, and approved by the Secretary eight (8) months prior to commencement of construction. Section 1.6 of the BMP provides details of consultation with BCS with regard to the development of the BMP. The BMP appears current and applicable to the project, with no opportunities for improvement identified.

A site inspection was undertaken as part of the audit. Project No-Go Zone fencing is now established on site in areas where construction has commenced. Trees felled for the project have been retained on site for beneficial re-use as coarse woody debris.

With the exception of the self-reported non-conformance identified in relation to the 'Bee Tree' incident (refer to S.3.4.1 above), the Biodiversity Management Plan generally appears to be implemented on site, including an ecologist on site during habitat clearing, nest box installation, no-go exclusion zones, sediment and erosion control and weed management. Site perimeter fencing had not been installed at the time of the audit.

The following recommendations were identified in relation to the Biodiversity Management Plan:

- **Self-Reported Non-compliance - Auditor Recommendation:** A project ecologist is to be on site during all future clearing events as required by the Biodiversity Management Plan.
- **Opportunity for Improvement No. 2:** That a process be established to restrict access to the 10 m buffer adjacent to the waterway and ensure crossing of this waterway is restricted to the designated road way crossing.

3.6.5 Heritage Management Plan

A Heritage Management Plan has been prepared, in consultation with relevant parties, and approved by the Secretary nine (9) months prior to commencement of construction. The Heritage Management Plan generally meets the documentation requirements of the Development Consent (Schedule 3, Condition 20) and no opportunities for improvement were identified.

With regard to implementation, Aboriginal Objects Care Agreement 4658 was obtained 20 October 2020 and Aboriginal artefacts IF01 and IF02 have been successfully salvaged in accordance with the requirements of this condition.

The proponent has self-reported a non-compliance to the Department with regard to the disturbance to artefact scatter AHIMS ID 43-4-0057 and direct impact to the Bee Tree AHIMS ID 43-4-0058. Investigations by NSW DPIE, Heritage NSW and West Wyalong LALC are current at the time of this audit (refer to Section 3.4.1 of this report for more details on this incident).

3.6.6 Landscaping Plan

A Landscaping Plan has been prepared and was approved almost one (1) year prior to commencement of construction. The Landscaping Plan adequately addressed the relevant requirements of the Development Consent and clearly identifies roles, responsibilities and tasks. No opportunities for improvement were identified by the auditor during the documentation review.

The PCL Construction Manager reported that no landscaping works had been undertaken at the time of this audit and thus the implementation of the plan had not yet been triggered.

3.6.7 Traffic Management Plan

The TMP has been prepared in consultation with the relevant agencies and has been approved by the Secretary. The TMP was approved by the Secretary 10 months prior to the commencement of road upgrades. The TMP adequately provides responsibilities and processes that addresses the requirements of the Development Consent (Schedule 3, Condition 7). The following auditor recommendations were identified in relation to the Traffic Management Plan:

- **Opportunity for Improvement No. 3:** In response to two complaints regarding vehicle access to site it is recommended that the Driver's Code of Conduct be updated to include or specifically reference the designated vehicle access routes set out within the Traffic Management Plan.
- **Opportunity for Improvement No. 4:** Whilst it is understood by the EPC Contractor that Bland Shire Council would manage and did undertake community notifications with regard to the project, it is recommended that the EPC contractor provide and maintain adequate record of project updates to residents and businesses within 2 km of the Project in accordance with the Traffic Management Plan in accordance with the Development Consent, Schedule 3, Condition 7.

3.6.8 Final Layout Plans

Final Layout plans were submitted to the Department prior to commencement of construction and as per staged development. The layout plans appear adequate and provide details on the siting of solar panels and ancillary infrastructure as required by the Conditions of Consent.

3.7 Status of Previous Audit Recommendations

This is the first Independent Environmental Audit for the Project.

3.8 Actual verses Predicted Environmental Impacts

The following section provides a summary of actual vs. predicted impacts for the key environmental aspects identified in the Environmental Impact Statement (EIS) prepared by Urbis Pty Ltd, January 2019. This is a high-level summary of the predicted impacts outlined within the executive summary of the EIS, as well as an general assessment of actual impacts in the opinion of the Auditor based on evidence of management plan implementation obtained during the audit and of observations made during the audit site inspection.

NSW DPIE undertook a State Significant Development Modification Assessment of the West Wyalong Solar Farm Modification 1, report dated September 2021, assessing the proposed modification in accordance with the relevant matters for consideration under the *Environmental Planning and Assessment Act* (EP&A Act). The Department determined that the modification would not result in any significant impacts beyond those that were assessed and approved under the existing consent.

The project was under construction at the time of the audit and hence this assessment considers construction related impacts only, as no operational data exists to assess operational or decommissioning impacts.

Table 3: Assessment of Predicted and Actual Impacts

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Auditor Comments
<p>Biodiversity</p> <p>The removal of 1.83 hectares of native vegetation comprising:</p> <ul style="list-style-type: none"> • 0.80 hectares of ‘Belah woodland (PCT 55). • 1.03 hectares of Weeping Myall open woodland (PCT 26). • 32 paddock trees. • 1.83 hectares of woodland habitat for fauna species. • Eleven habitat trees (containing 16 hollows). 	<p>Clearing of vegetation on site appears to have been conducted in accordance with the Approved Layout Plan and Biodiversity Management Plan.</p> <p>Project No-Go Zone fencing is now established on site in areas where construction has commenced. Trees felled for the project have been retained on site for beneficial re-use as coarse woody debris.</p>	<p>Environmental protection measures in place as per the approved Biodiversity Management Plan, for areas where construction has commenced.</p> <p>Detailed design of the transmission line (and related vegetation clearance in Myers lane) currently underway but not finalised. It was reported the design is being completed in accordance with the Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines, as per the Biodiversity Management Plan.</p> <p>Methods for biodiversity offsets are currently being investigated by LSbp but had not been finalised at the time of this audit. LSbp is still within the two-year timeframe to retire the biodiversity credits of a number and class specified in Table 1 of the Consent Conditions.</p> <p>The project appears consistent with predicted biodiversity outcomes at the time of this audit.</p>
<p>Aboriginal Cultural Archaeology and Heritage</p> <p>Aboriginal heritage assessment of the site revealed a total of four new Aboriginal sites within the study, with the following predicted impacts:</p> <ul style="list-style-type: none"> • WWSF IF01 (AHIMS ID43-4-0056): Direct impact mitigated through salvage. • WWSF IF02 (AHIMS ID43-4-0071): Direct impact mitigated through salvage. • WWSF AS01 (AHIMS ID 43-4-0057): Direct/partial impact mitigated through salvage and no-go zone. • WWSF Bee Tree (AHIMS ID 43-4-0058): Indirect/partial impact mitigated through no-go zone. 	<p>Aboriginal Objects Care Agreement 4658 was obtained 20 October 2020 and Aboriginal artefacts IF01 and IF02 were successfully salvaged in accordance with the requirements of this condition.</p> <p>The WWSF Bee Tree and areas of Artefact Scatter WWSF AS01 were observed to have been directly impacted by construction related activities, which were not mitigated through no-go zones.</p>	<p>The proponent has self-reported a non-compliance to the Department with regard to the disturbance to artefact scatter AHIMS ID 43-4-0057 and direct impact to the Bee Tree AHIMS ID 43-4-0058. Investigations by NSW DPIE, Heritage NSW and West Wyalong LALC are current at the time of this audit.</p> <p>The self-reported non-compliance is not consistent with predicted outcomes with regard to Aboriginal cultural heritage at the time of this audit.</p>
<p>Land</p> <ul style="list-style-type: none"> • No major land use conflicts predicted. • Short term pressure on availability of accommodation and services. 	<p>No land management impacts were evident or identified by the auditor at the time of the audit site inspection.</p> <p>West Wyalong had available accommodation for the auditor during the site visit.</p>	<p>Appropriate land management strategies were deemed to be in place at the time of the Auditor’s site visit. Zero (0) land management complaints have been received by the Project team.</p>

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Auditor Comments
<ul style="list-style-type: none"> Land and soil capability can accommodate high impact land uses with implementation of mitigation measures. 		<p>The project appears consistent with predicted land management outcomes at the time of this audit.</p>
<p>Visual</p> <ul style="list-style-type: none"> Minimal to no visual impact. 	<p>No visual impacts were evident or identified by the auditor at the time of the audit site inspection.</p> <p>Landscaping works (in accordance with the Landscape Management Plan) had not commenced at the time of the audit site inspection.</p>	<p>Landscaping works (in accordance with the Landscape Management Plan) have not commenced at the time of the audit site inspection.</p> <p>The EPC Contractor is aware of these requirements.</p> <p>The project appears consistent with predicted visual impacts at the time of this audit.</p>
<p>Acoustic</p> <ul style="list-style-type: none"> No expected cumulative noise effects No exceedances of the noise management levels. 	<p>No high-noise generating activities were evident at the time of the audit site inspection.</p>	<p>Appropriate noise mitigation strategies were deemed to be in place at the time of the audit site inspection.</p> <p>No noise specific complaints have been received by the Project Team at the time of the audit.</p> <p>The project appears consistent with predicted acoustic outcomes at the time of this audit.</p>
<p>Traffic and Access</p> <ul style="list-style-type: none"> No significant impacts on local road network. Blands Lane and Bodells Lane will be maintained to an appropriate standard during and after the construction period. 	<p>No significant impacts to local roads were evident at the time of the audit site inspection. Road upgrade works were occurring at the time of the audit on Blands Lane, with the road open and operating under approved traffic control.</p>	<p>Appropriate traffic mitigation strategies were deemed to be in place at the time of the audit site inspection.</p> <p>No noise specific complaints have been received by the Project Team at the time of the audit.</p> <p>The project appears consistent with predicted traffic and access outcomes at the time of this audit.</p>
<p>Geotechnical</p> <ul style="list-style-type: none"> Geotechnical impact of the development is considered to be manageable through construction practices. 	<p>No geotechnical impacts were evident at the time of the audit site inspection.</p>	<p>Appropriate geotechnical strategies were deemed to be in place at the time of the audit site inspection.</p> <p>The project appears consistent with predicted geotechnical impacts at the time of this audit.</p>
<p>Hazards and Risks</p> <ul style="list-style-type: none"> Whilst not identified as bushfire prone land, bushfire risks will be managed. Threshold quantities for the dangerous goods to be stored and transported are not exceeded 	<p>No specific bushfire risks were evident at the time of the audit site inspection.</p> <p>Dangerous goods are stored within dedicated, bunded storage containers within the site laydown area. Threshold quantities have not been exceeded.</p>	<p>Asset protection zones are being established as part of the site boundary and access roads.</p> <p>The project appears consistent with predicted hazards and risk impacts at the time of this audit.</p>
<p>Water</p> <ul style="list-style-type: none"> Very low impact on the environment and the existing 	<p>No water quality or water management impacts were evident at the time of the audit site inspection. Sediment erosion fences were observed installed as per the Sediment</p>	<p>Appropriate water and sediment erosion control strategies were deemed to be in place at the time of the audit site inspection.</p>

Predicted Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Auditor Comments
behaviour of surface and ground waters.	and Erosion Control Plan. Recent inspections have included effectiveness of sediment and erosion controls.	The project appears consistent with predicted water impacts at the time of this audit.
Waste <ul style="list-style-type: none"> Waste management practices will be suitable for the management of waste generated during the construction and operation phases of the proposal. Majority of waste generated during the construction and operation phases will either be reused or recycled, with the remainder set to landfill. 	No waste related impacts were evident at the time of the audit site inspection. The site compound was maintained in a clean and tidy manner. Dedicated recycling and landfill bins were provided within the site compound and laydown areas.	Minimal waste has been generated by the project to date. Appropriate waste management strategies were deemed to be in place at the time of the audit site inspection. The project appears consistent with predicted waste impacts at the time of this audit.
Socio-Economic <ul style="list-style-type: none"> Long term positive impact for NSW by increasing the supply of renewable energy in NSW and reducing greenhouse gas emissions. It will also deliver local employment and economic benefits to Bland Shire LGA 	No specific socio-economic issues were evident at the time of the audit site inspection.	The project appears consistent with predicted outcomes.

3.9 Outcomes of Audit Site Inspection

Site inspections were undertaken on the project with the aim of assessing the effectiveness of environmental management measures on site and to observed current environmental performance. The first inspection focused on the Solar Farm works within the approved layout, whilst the second inspection focussed on road upgrade works along Blands Lane. Both of these inspections occurred on Wednesday 20 October 2021.

The auditor was escorted by representatives of LSbp and PCL during the site inspections. The weather was dry and approximately 22°C, with light winds. Recent rains in the broader region have resulted in a lush groundcover, some standing water and reduced potential for dust generation.

The site inspection consisted of a walk across site to inspect active work areas at the time of the audit, being the internal road and piling in the north of the site, as well as aboriginal heritage sites and environmental protection zones.

An inspection of road upgrade works was undertaken by light vehicle and covered the limit of works along Blands Lane. Independently, the Auditor also inspected the Newell Highway/Bodells Lane intersection works.

Work activities observed included:

- Results of previously completed vegetation clearing;
- Civil earthworks associated with initial internal road construction;
- Delineation of no-go zones, including around the Bee Tree and internal habitat protection areas;
- Piling works associated with solar panel infrastructure;
- Main site compound establishment;
- Main site access establishment.
- Road upgrade works along Blands Lane

- Installation of nest boxes within Gordons Lane and along Blands Lane.
- There were no work activities past or current within Myers Lane.

Photographs taken during the site inspection are included in Appendix E.

Key environmental protection measures observed during the site inspection and audit generally are summarised below:

- Water carts were observed in use for dust suppression, including along Blands Lane.
- Stockpiles observed on site were restricted in size and were protected on the downslope by sediment fencing.
- A good level of groundcover was observed across the site and this is being maintained as best as possible, including through slashing and use of designated internal roadways.
- Erosion and sediment controls were observed on site and implementation of these controls appeared consistent with the requirements of the documented Erosion and Sediment Control Plan.
- No-go zone fencing is now installed in relevant locations within active construction areas.
- Aboriginal heritage areas are also protected by no-go fencing.
- Daily plant pre-start log-books were completed for a sample of plant observed.
- The site access, laydown areas and site compound have been sealed to minimise erosion and dust issues.
- Construction of Internal access roads has commenced, but these roads are not yet constructed as all-weather roadways.
- Nest boxes were observed install within the internal habitat protection area, as well as within Gordons Land and along Blands Lane.
- Site inspections have been completed and records maintained.
- Storage of fuels and chemicals with suitably labelled and banded enclosures;
- Segregated waste and recyclable material bins were provided for within the site compound;
- Site compound, site shed and construction areas were well presented with strict house-keeping processes implemented.

Opportunity for Improvement No 7: During the site inspection it was observed exclusion fencing installed in an area adjacent to the bee tree, however this is now redundant as permanent no-go fencing has been installed. It is recommended that the previous exclusion fencing be removed as it is currently damaged and in-effective.

3.10 Key Improvements

This was the first independent environmental audit.

3.11 Key Strengths

The auditor identified the following key strengths during the audit period:

- The Project team, inclusive of both proponent and contractor personnel, were open and honest during the audit and this is indicative of the overall culture on site.
- Positive culture of environmental reporting, as demonstrated by the recent incident.
- Record keeping is at a high standard, with the majority of records requested being readily available, accurate and complete.
- Whilst an incident has occurred on site, both the Proponent and the Contractor, are working towards securing the best possible outcomes given the situation.

4 Summary of Audit Non-Compliances and Recommendations

The findings of the IEA of the Development Consent SSD 9504 Mod 1 are presented in this section. The audit table included as Appendix A provides detailed compliance assessments, including evidence collected to substantiate compliance.

The compliance assessment was based on visual observations of the activities being undertaken on the West Wyalong Solar Farm site as obtained during the IEA site inspections, interviews with site personnel and interpretation of the documentation and records provided to the auditor during the IEA.

Opinions expressed in the compliance assessment apply to the activities, as they existed at the time of the IEA and from information provided by site personnel. Variations to this information of which the auditor is not aware and did not have the opportunity to assess, have not been considered in the compliance assessment.

Non-compliant requirements identified during the audit are consolidated in Section 4.1 below. Refer to Appendix A for the complete audit findings and further context regarding each condition of the Development Consent.

General recommendations and opportunities for improvement identified during this Independent Environmental Audit are consolidated in Section 4.2.

4.1 Non-Compliances and Auditor Recommendations

Following completion of this IEA, there were three (3) non-compliances identified against fifty-seven (57) conditions of the Development Consent, as well as two (2) self-reported non-compliances in relation to one reportable incident on site. The five (5) non-compliances are consolidated in Table 4 below:

Table 4: Non-compliances and Recommendations.

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
Project Approval SSD 9504 Mod 1			
WWSF-IEA-2021 NC 01	Schedule 3, Condition 13	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • managing the remnant vegetation and fauna habitat on site; • protecting vegetation and fauna habitat outside the approved disturbance areas; • minimising the clearing of native vegetation and fauna habitat within the Myers Lane road reserve; • minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; • minimising the impacts to fauna on site and implementing fauna 	<p>A site inspection was undertaken as part of the audit. Project No-Go Zone fencing is now established on-site within active construction areas.</p> <p>Non-compliance WWSF IEA NC1</p> <p>Environmental protection measures listed in Tables 4-1 and 4-2 were generally observed implemented during the audit site inspection, including no-go zones, sediment and erosion control, inspection of work areas. However, based on the reported incident (refer to Self-Reported Non-Compliance below), the ecologist was not present during all vegetation clearing on site, no-go zones were not established prior to clearing commencing, and vegetation clearing was not monitored to ensure compliance which in non-compliant with the mitigation measures provided within Table 4-1 and thus non-compliant with the implementation requirements of this condition.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
		<p>management protocols;</p> <ul style="list-style-type: none"> • avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; • rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area; • maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and • controlling weeds and feral pests; <p>(b) include a fauna monitoring and management protocol, including identification and reporting of fauna mortalities to BCS; and</p> <p>(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.</p> <p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>Self-Reported Non-compliance NC1</p> <p>The proponent has self-reported a non-compliance with Condition 19 and 20 of SSD 9504 to the Department and other relevant agencies and stakeholders with regard to the Bee Tree Incident on 23 August 2021.</p> <p>Investigations into the non-compliance remain ongoing, however it is apparent that no-go fencing was not installed by the Construction Contractor prior to construction activities commencing and therefore the requirements of the Protocol 13 of the Biodiversity Management Plan were not complied with.</p> <p>Auditor Recommendation:</p> <p>No-go fencing to be installed in all remaining non-active construction areas (e.g. Myers Lane) to ensure it is effectively in place prior to construction activities commencing in these areas.</p>
WWSF-IEA-2021 NC 02	Schedule 3, Condition 21	<p>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.</p> <p><i>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.</i></p>	<p>Non-Conformance</p> <p>The Proponent has not obtained the necessary water licences for the development.</p> <p>Auditor recommendation:</p> <p>Proponent to obtain necessary water licences for the project.</p>
WWSF-IEA-2021 NC 03	Schedule 4, Condition 1	<p>Prior to commencing the development, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> (a) provide the strategic framework for environmental management of the development; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the 	<p>Non-compliant – Implementation of the CEMP</p> <p>The HSE Plan has been inconsistently implemented on site, with requirements such as environmental risk register and project environmental checklist not being completed and regular site environmental inspections being completed following a different process than that described in the HSE Plan (i.e. using a different checklist to the one nominated in the HSE Plan). The site risk register provided for review during the audit did not identify or assesses environmental aspects and impacts.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
		<p>environmental management of the development;</p> <p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; respond to emergencies; and <p>(e) include:</p> <ul style="list-style-type: none"> references to any plans approved under the conditions of this consent; and a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	<p>The risk register provided does not adequately identify or assesses environmental aspects and impacts.</p> <p>Whilst site inspections are occurring on site, the completion of these is ad-hoc and the forms used for the inspections are inconsistent and/or informal. Inspection records were provided for October, however construction commenced in early August 2021.</p> <p>Auditor Recommendations:</p> <ul style="list-style-type: none"> A detailed internal audit be promptly undertaken on the PCL HSE plan (as required by the CEMP and EMS) to verify the statements and procedures within the HSE Plan, verify implementation and to identify areas to streamline content to enable better interpretation and effective implementation on site. The project risk register be reviewed and revised to adequately identify and assesses environmental aspects and impacts. The implementation of the existing CEMP could be improved by establishing one concise monitoring and accountabilities schedule depicting all the relevant inspection, monitoring and reporting requirements as outlined within all project management plans, including frequency, type, person responsible, method/form, record(s) to be maintained and reporting requirements. There are currently 2 mobile plant registers being maintained and it is recommended these be consolidated into one register covering all plant and equipment on site, and that any identified gaps in on-boarding documentation, such as most recent maintenance records, be promptly rectified.
<p>The following 2 non-conformances have been notified as an incident</p>			
<p>WWSF-IEA-2021 Self Reported SR NC 01</p>	<p>Schedule 3, Condition 19.</p>	<p>The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3 or located outside the approved development footprint.</p>	<p>Self-Reported Non-compliance</p> <p>The proponent has self-reported a non-compliance with the requirements of this condition to the Department and other relevant agencies and stakeholders.</p> <p>A direct impact has occurred to an Aboriginal heritage item identified in Table 1 of Appendix 3 of the Consent, namely a WWSF Bee Tree, AHIMS number 43-4-0058, identified as a scarred tree.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
			<p>Early investigations by the project team indicate that as a result of ‘no go’ fencing not being erected around the Bee Tree and the Bee Tree being incorrectly identified for removal, clearing operations on the 23rd of August 2021, resulted in direct impact to the Bee Tree (AHIMS ID 43-4-0058) causing non-compliance with the requirements of this condition.</p> <p>Auditor Recommendation:</p> <p>At the time of this audit, NSW DPIE, Heritage NSW and West Wyalong LALC are investigating the incident and as such the auditor declines to make recommendations with regard to the incident.</p>
Schedule 3, Condition 19A		<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 3, the Applicant must salvage and relocate the item/s that would be impacted and obtain a Care Agreement for the transfer and safekeeping of artefacts to the West Wyalong Local Aboriginal Land Council.</p> <p>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 3.</p>	<p>Refer to above. Condition 19A was established as part of SSD 9504 Modification 1, and came into effect after the incident. The self-reported non-compliance with Schedule 3, Condition 19 of the Development Consent is considered to have included the requirements of this condition.</p>
WWSF-IEA-2021 Self Reported SR NC 02		<p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ol style="list-style-type: none"> (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders; (c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • protecting the Aboriginal heritage items identified in Table 1 of Appendix 3 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction; • salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 3; • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - previously unidentified 	<p>Self-Reported Non-compliance</p> <p>A direct impact has occurred to an Aboriginal heritage item identified in Table 1 of Appendix 3 of the Consent, namely a WWSF Bee Tree, AHIMS number 43-4-0058, identified as a scarred tree.</p> <p>Early investigations by the project team indicate that as a result of ‘no go’ fencing not being erected around the Bee Tree and the Bee Tree being incorrectly identified for removal, clearing operations on the 23rd of August 2021, resulted in direct impact to the Bee Tree (AHIMS ID 43-4-0058) causing non-compliance with the requirements of this condition.</p> <p>Auditor Recommendation:</p> <p>At the time of this audit, NSW DPIE, Heritage NSW and West Wyalong LALC are investigating the incident and as such the auditor declines to make recommendations with regard to the incident.</p>

#	Approval ID	Specific requirement	Independent Audit Findings and Recommendation
		<p>heritage items are found; or Aboriginal skeletal material is discovered;</p> <ul style="list-style-type: none"> - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and - ongoing consultation with Aboriginal stakeholders during the implementation of the plan; • include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. <p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	

4.2 Opportunities for improvement

Seven (7) opportunities for improvement were identified during the completion of this IEA as noted below:

- **Opportunity for Improvement No. 1:** LSbp and PCL must ensure the requirements of the Biodiversity Management Plan are implemented for all future clearing on site.
- **Opportunity for Improvement No. 2:** In accordance with the Development Consent (Schedule 4, Condition 2), the Environmental Management Strategy and supporting management plans, including the Construction Environmental Management Plan, require review, and if necessary revision to the satisfaction of the Secretary, to address the outcomes of the reportable incident and to address relevant changes to the Development Consent following approval of Modification 1 in accordance with Schedule 4, Condition 2 of the Development Consent.
- **Opportunity for Improvement No. 3:** That a process be established to restrict access to the 10m buffer adjacent to the waterway (as set out within the Biodiversity Management Plan) and ensure crossing of this waterway is restricted to the designated road way crossing.
- **Opportunity for Improvement No. 4:** In response to two complaints regarding vehicle access to site it is recommended that the Driver's Code of Conduct be updated to include or specifically reference the designated vehicle access routes set out within the Traffic Management Plan.
- **Opportunity for Improvement No. 5:** Whilst it is was understood by the EPC Contractor that Bland Shire Council would manage, and did undertake, community notifications with regard to the project, it is recommended that the EPC contractor provide and maintain adequate record of project updates to residents and businesses within 2 km of the Project in accordance with the Traffic Management Plan in accordance with the Development Consent, Schedule 3, Condition 7.
- **Opportunity for Improvement No. 6:** That PCL obtains and maintains a record of the Herbicide Application Report once received from Duncan Contracting and Mechanical.
- **Opportunity for Improvement No. 7:** During the site inspection it was observed exclusion fencing installed in an area adjacent to the bee tree, however this is now redundant as permanent no-go fencing has been installed. It is recommended that the previous exclusion fencing be removed as it is currently damaged and in-effective.

5 Conclusion

The audit of the West Wyalong Solar Farm against the criteria in Section 1.2 demonstrated that the site is generally compliant with their environmental management obligations under the Development Consent SSD 9504 Mod 1. The actual impacts of the project appear consistent with those predicted in the Environmental Impact Statement, with the exception of the reported environmental incident of direct and indirect impact to two Aboriginal Heritage items.

At the conclusion of this IEA, the following number of non-compliances and opportunities for improvement were identified:

- Three (3) new non-compliances were identified against three (3) conditions of Development Consent;
- Two (2) self-reported non-compliances against two (2) conditions of consent and
- Seven (7) auditor recommendations for continual improvement.

J2M Systems have recommended actions to address each of the non-conformance and opportunities for improvement identified. These actions are summarised in Section 4 of this Audit Report.

Following the issue of the draft audit report, Lightsourcebp provided responses to the identified non-compliances and auditor recommendations for continual improvement. In accordance with the NSW DPIE Independent Audit – Post Approval Requirements, J2M Systems advised the Proponent that their response to the audit findings must be submitted to the Department in a separate document to the final Independent Audit Report. Other than minor administrative corrections, no fundamental changes were made to the audit report prior to final issue.

Appendixes

The following appendixes are attached to this document:

- Appendix A: Independent Audit Table
- Appendix B: Planning Secretary Audit Team Agreement
- Appendix C: Consultation
- Appendix D: Independent Audit Declaration Form
- Appendix E Site Inspection Photographs.

Appendix A: Independent Audit Table

Independent Environmental Audit Table

Appendix A: Independent Audit Table

Planning Decision Notice Reference: SSD 9504 MOD 1

West Wyalong Solar Farm

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 2	Administrative Conditions			
Obligation to minimise harm to the environment				
1	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.	Refer to evidence collected throughout this audit table. Discussions with LSBP Principal Environmental Planner. Discussions with LSBP Site Manager. Discussions with PCL Construction Manager.	Based on the development and overall implementation of the project environmental management plans and on the basis that no environmental material harm incidents have occurred, the project is generally considered compliant with the requirements of this condition, with the exception of the non-compliances identified by this audit.	Compliant.
Terms of consent				
2	The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent.	Refer to evidence collected throughout this Audit Table. Site inspection undertaken 20-22 October 2021. a) This checklist includes an assessment of compliance against the mitigation measures proposed in the EIS. b) This checklist includes an assessment of compliance against each condition of consent.	This audit has individually assessed the conditions of consent and mitigation measure proposed within the EIS. Compliance with each condition is outlined throughout this Audit Table. With exception to the non-conformances and auditor recommendations identified by this audit, works were generally considered to be compliant with the EIS and conditions of consent. The audit table identifies the specific non-compliant findings identified against the individual condition of consent and against the mitigation measures outlined in the IEA.	Compliant.
3	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	The auditor did not identify any inconsistency during the audit and no inconsistencies were reported to the auditor during interviews with the Project team.	No inconsistency identified or reported.	Not triggered.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
4	<p>The Applicant must comply with any requirements of the Secretary arising from the Department's assessment of:</p> <ul style="list-style-type: none"> (a) any strategies, plans or correspondence that are submitted in accordance with this consent; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in these documents. 	<p>Evidence of consultation with the Department regarding development of the management plans is included as an appendix to the individual management plans and is assessed at relevant conditions within this audit table.</p> <p>Correspondence from NSW DPIE to LSbp (dated 21 September 2021) RE: West Wyalong Solar Farm (SSD 9504) - Show Cause. Representations to be received no later than COB 06 October 2021.</p>	<p>No outstanding actions were identified during the audit.</p>	Compliant.
Final layout plans				
5	<p>Prior to the commencement of construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, via the Major Projects website including details on the siting of solar panels and ancillary infrastructure.</p> <p>Note: if the construction of the development is to be staged, then the provision of these plans may be staged.</p>	<p>Correspondence from Proponent to the Department, dated 06 August 2021, re: Notice of Commencement and Final Layout Plans. Submission of final layout plan for Myers Lane Transmission Line to be stage.</p> <p>Correspondence from Proponent to the Department, dated 12 August 2021 re: Submission of final layout plans for Myers Lane Transmission Line.</p> <p>Document lodgement receipt for Notice of Commencement and Final Layout Plans (undated).</p>	<p>Layout plans were submitted prior to commencement of construction and as per staged development. The layout plans include details on the siting of solar panels and ancillary infrastructure.</p>	Compliant.
Upgrading of solar panels and ancillary infrastructure				
6	<p>Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the Applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.</p>	<p>Construction commenced 07 August 2021. This requirement is not yet triggered.</p>	<p>Nil.</p>	Not triggered.
Work as executed plans				

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
7	Prior to the commencement of operations, or following the upgrades of any solar panels or ancillary infrastructure, the Applicant must submit work as executed plans of the development showing comparison to the approved final layout plans to the Department via the Major Projects website .	Construction commenced 07 August 2021 and remains ongoing at the time of this audit. As such the requirement of this condition has not yet been triggered.	Nil.	Not triggered.
Notification of Department				
8	<p>Prior to commencing the construction, operations, upgrading or decommissioning of the development of the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website of the date of commencement, or cessation, of the relevant phase.</p> <p>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.</p>	<p>Correspondence from Proponent to the Department, dated 06 August 2021, re: Notice of Commencement and Final Layout Plans. Submission of final layout plan for Myers Lane Transmission Line to be stage</p> <p>Document lodgement receipt for Notice of Commencement and Final Layout Plans (undated).</p> <p>Correspondence from Proponent to the Department RE: West Wyalong Solar Farm (SSD 9504) – Notice of Commencement & Final Layout Plans, dated 12 August 2021. This sets out the revised final layout plan for the West Wyalong Solar Farm project, incorporating the transmission line in the Myers Lane corridor.</p>	<p>The Proponent notified the Department in writing 1 day prior to commencing construction. This notification included details of the staged submission of the final layout plans for the Myers Lane Transmission Line.</p> <p>Final Layout Plans for Myers Lane Transmission Line were provided to the Department as requested.</p> <p>Note: Operations, upgrading or decommissioning works have not been undertaken at the time of this audit, and construction work is current and ongoing at the time of this audit. As such, the requirements relating to these phases have not yet been triggered.</p>	Compliant.
Structural adequacy				
9	<p>The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the <i>Building Code of Australia</i>.</p> <p>Notes:</p> <ul style="list-style-type: none"> - Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. - Part 8 of the EP&A Regulation sets out the 	<p>Discussions with LSbp Principal Environmental Planner.</p> <p>Discussions with LSbp Site Manager.</p> <p>Discussions with PCL Construction Manager.</p> <p>Sighted approved construction certificate for the Stage 1 including piles, trackers, PV Module Installation and fencing issued 24/09/2021 Buildcert to LSbp.</p> <p>Other constructions certificates are to be obtained for</p> <ul style="list-style-type: none"> - Civil works for subgrade treatment. - Electrical works - PCU installations and - OEM 	<p>A construction certificate has been obtained for the Stage 1 works which had commenced at the time of this audit. Works covered under this construction certificate include piles, trackers, PV Module Installation and fencing.</p> <p>Other construction and occupation certificates are to be obtained as required.</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	requirements for the certification of the development.			
Demolition				
10	The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	Site observations and discussions with site team.	Construction commenced 07 August 2021 and remains ongoing, as such the requirement of this condition has not yet been triggered.	Not triggered.
Protection of public infrastructure				
11	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <p>The condition does not apply to the upgrade and maintenance of the road network, which is expressly provided for in the conditions of this consent.</p>	<p>Discussions with PCL Site Safety Advisor.</p> <p>Discussions with PCL Construction Manager.</p>	The Site Safety Advisor and Construction Manager reported that no public infrastructure has been damaged or required to be relocated at the time of this audit. As such the requirement of this condition has not yet been triggered.	Not triggered
Operation of plant and equipment				
12	<p>The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:</p> <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner. 	<p>Site inspection 20 – 22 October 2021.</p> <p>A selection of plant observed on site during audit site inspection was sampled to assess compliance with this condition, with the following evidence obtained to demonstrate plant and equipment being maintained.</p>	All plant in use at the time of the audit site inspection appeared to be operated in a proper and efficient manner. Inspection and maintenance records were generally available to support the ongoing upkeep of plant and equipment.	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>PCL Mobile Plant Management Plan dated 14 April 2021.</p> <p>PCL is implementing a WWSF mobilisation checklist, which is due to be required 48hrs notice prior to mobilisation.</p> <p>PCL Mobile Plant Register *** Mobile Plant Register not entirely up to date.</p> <p>TranexSolar Plant and Equipment Register. Including details on make, rego, service.</p> <p>Octecto Piling Rig: REGO Serial No: 2171637/2171241 Octecto #2.</p> <ul style="list-style-type: none"> - Weed and seed certificate, 02/09/2021. - TranEx piling rig operator Justin Petrie – VOC not maintained. <p>Komatsu Bulldozer.</p> <ul style="list-style-type: none"> - Inspection report 27/09/2021. - Komatsu operator – Darren Neyenhuis Bulldozer statement of attainment from 16/05/2011 (LZ). <p>PCL Plant Inspection Checklist. Plant operator competency is managed through the PCL Training Matrix.</p> <p>Moxy DT101 Mobile Plant Checklist completed 05/08/2021.</p> <p>Case 30T Excavator EX110 Mobile Plant Checklist completed 05/08/2021.</p> <p>Grader (Cleary Earthmoving CL12) Mobile Plant Checklist completed 21/07/2021.</p> <p>Skid steer E85 Mobile Plant Checklist completed 15/07/2021.</p> <p>Service record 12/03/2021 for RO104-14t Smooth drum roller.</p>	<p>Auditor Recommendation: PCL has established a Mobile Plant Register, however it is not currently maintained up to date for all the plant on site.</p> <p>Auditor Recommendation: Whilst generally available, improvement is required to ensure the completeness of records associated with on-boarding of plant and equipment prior to commencing on site, including for weed and seed inspections and plant maintenance records.</p>	

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Service record 04/11/2020 for EX101-5.5T Excavator Service record 27/01/2021 for EX108 14T Excavator.		
Schedule 3	Environmental Conditions – General			
Over-dimensional and heavy vehicle restrictions				
1	The Applicant must ensure that the: <ul style="list-style-type: none"> (a) development does not generate more than: <ul style="list-style-type: none"> - 25 heavy vehicle movements a day during construction, upgrading or decommissioning; - 1 over-dimensional vehicle movements during construction, upgrading and decommissioning; and - 1 heavy vehicle movement a day during operations; on the public road network; and (b) length of any vehicles (excluding over-dimensional vehicles) used for the development does not exceed 26 metres, unless the Secretary agrees otherwise. 	<p>PCL site security team are maintaining a Truck Movements Register, which has been updated to the date of this audit.</p> <p>Discussion with PCL Construction Manager.</p> <p>Correspondence between LSbp and TfNSW, dated between 23 December 2020 and 19 January 2021 regarding approval of request to increase the maximum number of heavy vehicles permitted to access the site in any day from 25 trucks (50 movements) to 50 trucks (100 movements).</p> <p>Correspondence between LSbp and Bland Shire Council, dated between 16 December 2020 and 13 January 2021 regarding approval of request to increase the maximum number of heavy vehicles permitted to access the site in any day from 25 trucks (50 movements) to 50 trucks (100 movements).</p> <p>Correspondence from LSbp to NSW DPIE RE: West Wyalong Solar Farm (SSD9504) – Request to Vary Condition 1, dated 19 January 2021.</p> <p>Ason Group Supplementary Traffic Impact Assessment Advice, dated 23 December 2020.</p> <p>Correspondence from NSW DPIE to LSbp, dated 24 February 2021, approving the increase in heavy vehicles from 25 to 50 movements per day.</p>	<p>PCL site security team are maintaining a Truck Movements Register, which has been updated to the date of this audit. This register indicates compliance with the requirements of this condition, as amended by NSW DPIE.</p> <p>The PCL Construction Manager reported that no over-dimensional vehicles have attended site to date and there have been no complaints relating to the requirements of this condition.</p>	Compliant.
2	The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day.	Register maintained by security.	PCL site security team are maintaining a Truck Movements Register, which has been updated to the date of this audit.	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Access routes				
3	<p>All heavy vehicles up to a maximum of 19 metres in length associated with the development must travel to and from the site via the:</p> <ul style="list-style-type: none"> (a) Newell Highway (northeast), Bodells Lane and Blands Lane; or (b) West Wyalong Heavy Vehicle Bypass, the Newell Highway (southwest), Bodells Lane and Blands Lane; and the approved site access point on Blands Lane, as identified in the figure in Appendix 4. <p>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.</p>	<p>Discussion with PCL Construction Manager.</p> <p>Traffic Management Plan, prepared by pitt&sherry, Rev 3, dated 04 September 2020.</p> <p>Site Traffic Management Plan, PCL, 23 May 2020</p> <p>Drivers Code of Conduct, PCL, 07 June 2021.</p> <p>West Wyalong Solar Farm Delivery Driver Information Sheet, which includes details on the heavy vehicle traffic route to site.</p> <p>Site Specific Delivery Driver – Safety Overview (PCL powerpoint presentation).</p> <p>Complaints register.</p>	<p>The designated and approved transport route is outlined in Section 5 of the approved Traffic Management Plan, including Figure 3: Site vehicle access routes, as well as within the West Wyalong Solar Farm Delivery Driver Information Sheet, site induction and site specific delivery driver safety overview presentation.</p> <p>The PCL Construction Manager reported no over-dimensional vehicles used in the project to date.</p> <p>There have been no complaints relating to the requirements of this condition.</p>	Compliant.
3A	<p>All heavy vehicles greater than 19 metres in length and over-dimensional vehicles associated with the development must travel to and from the site via the Newell Highway (northeast), Bodells Lane and Blands Lane and the approved site access point on Blands Lane, as identified in the figure in Appendix 4</p>	<p>Discussion with PCL Construction Manager.</p> <p>Traffic Management Plan, prepared by pitt&sherry, Rev 3, dated 04 September 2020.</p> <p>Site Traffic Management Plan, PCL, 23 May 2020</p> <p>Drivers Code of Conduct, PCL, 07 June 2021.</p> <p>West Wyalong Solar Farm Delivery Driver Information Sheet, which includes details on the heavy vehicle traffic route to site.</p> <p>Site Specific Delivery Driver – Safety Overview (PCL powerpoint presentation).</p> <p>Complaints register.</p>	<p>The PCL Construction Manager reported no vehicles greater than 19 metre in length have accessed the site to date.</p> <p>There have been no complaints relating to the requirements of this condition.</p>	Not triggered.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
4	All light vehicles and shuttle buses associated with the development must travel to and from the site via the Newell Highway, Clear Ridge Road, Blands Lane and the approved site access point on Blands Lane, as identified in the figure in Appendix 4.	<p>Correspondence from the Department to the Proponent, dated 11 September 2020, regarding review and approval of the Traffic Management Plan required by this condition.</p> <p><i>West Wyalong Solar Farm Traffic Management Plan (TMP), Revision 3, dated 04 September 2020, prepared by pitt&sherry.</i></p> <p>Induction (Full and Visitor), which includes traffic and transport routes.</p> <p>Site observations 20-22 October 2021.</p>	<p>The site-specific induction includes information regarding light vehicle access to site. All light vehicles observed during the audit were seen entering and exiting the site via the approved access routes.</p> <p>There have been no complaints relating to the requirements of this condition.</p>	Compliant.
Road upgrades and site access				
5	<p>Prior to commencing construction, the Applicant must:</p> <ul style="list-style-type: none"> (a) upgrade the intersection of the Newell Highway and Bodells Lane, including a Basic Left Turn (BAL) treatment to cater for the largest vehicle accessing the site; (b) seal Bodells Lane for a minimum of 50 m from its intersection with the Newell Highway, to a standard that allows two-way heavy vehicle movements; (c) upgrade Blands Lane between Bodells Lane and Clear Ridge Road, including grading, with an all-weather seal to be applied on Blands Lane between the site access point and Bodells Lane; (d) design the site access point off Blands Lane (shown in Appendix 1) with a Rural Property Access type treatment to cater for the largest vehicle accessing the site. <p>These upgrades must comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), and be carried out to the satisfaction of the relevant roads authority.</p>	<ul style="list-style-type: none"> (a) Correspondence from TfNSW dated 19 August 2021 indicating practical completion for the Newell Highway and Bodells Lane intersection, achieved on 17 August 2021 (10 days after commencement of construction). (b) Correspondence from TfNSW dated 19 August 2021 indicating practical completion for the Newell Highway and Bodells Lane intersection, achieved on 17 August 2021 (10 days after commencement of construction). (c) Combined Construction Issue drawings – Blands Lane and Newell Highway Upgrade Coversheet and drawing index. The upgrade of Blands Lane between Bodells Lane and Clear Ridge Road was ongoing at the time of the audit. (d) Combined Construction Issue drawings – Blands Lane and Newell Highway Upgrade Coversheet and drawing index. Including General Arrangement Plan for the access road off Blands Lane (Sheet RD-101). <p>Newell HY / Bodells Lane intersection commenced 17 July 2021.</p>	<p>Newell HY / Bodells Lane intersection upgrade works commenced 17 July 2021 and practical completion was awarded 17 August 2021 (10 days after commencement of construction).</p> <p>Auditor Recommendation: Whilst practical completion has been achieved, the permanent line-marking and signage installation have not yet installed due to covid restrictions and it is recommended these be completed.</p> <p>The upgrade of Blands lane and Bodells lane was not completed prior to commencement of construction and was ongoing at the time of this audit.</p> <p>The auditor acknowledges that NSW DPIE, Bland Shire Council and TfNSW are all aware of the delays and that both TfNSW and Bland Shire Council confirmed they were satisfied that the road upgrades were of a sufficient standard as of 6 August 2021 to enable construction activities to commence on the West Wyalong Solar Farm.</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>Internal road way – construction 07 August</p> <p>Correspondence between LSbp and Bland Shire Council Correspondence between LSbp and TfNSW, dated between 16 June 2021 and 12 August 2021, RE: Staging of Road Upgrades and Early Work.</p> <p>Department – DPIE correspondence – Lightsourcebp – correspondence.</p> <p>Delay by rain. Design</p> <p>Council Engineering Manager (Jamie Harwood and Will Marsh)</p> <p>Sighted email correspondence from PCL Construction Manager to Council Engineering Manager 17/09/2021 for inspection and proof roll.</p> <p>Ongoing correspondence between Bland Shire Council, PCL, JJ Ryan (designer) via email regarding design changes on Blands Lane 19 August 2021 and 31/08/2021 (modified designs).</p> <p>Water crossing approximately in the middle of the road is currently being investigated for redesign (Chainage 5000).</p>	<p>Auditor Recommendation: Continue with road upgrades as required under this condition.</p>	
Operating Conditions				
6	<p>The Applicant must ensure:</p> <p>(a) the internal project site roadways are constructed as all-weather roadways;</p> <p>(b) there is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site;</p>	<p>Site observations 20 – 22 October 2021.</p> <p>a) The only internal roadway constructed at the time of the audit was the main site access road, which is sealed.</p>	<p>a) The only internal roadway constructed at the time of the audit was the main site access road, which is sealed. The internal access ways were under construction at the time of this audit.</p> <p>Auditor recommendation</p>	Complaint.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> (c) the capacity of the existing roadside drainage network is not reduced; (d) all vehicles are loaded and unloaded on site, and enter and leave the site in a forward direction; and (e) vehicles leaving the site are in a clean condition and do not result in dirt being tracked onto the public road network. 	<p>Sighted E309343-RBG-CIV-DWG-4452 (Rev 2) which included Type 1 Pavement Detail, including 50mm wearing layer (during construction) and 100m wearing layer (for operations).</p> <p>Civil and Structural Engineering Design report, S.3.6.2 Design Criteria – Austroads – Guide to pavement technology Part 6 Unsealed Pavements.</p> <p>The current construction program has a 10-week construction period for all internal roadways.</p> <p>Erosion and Sediment Control Plan (RobertBirdGroup), Drawing No. E309343-RBG-CIV-DWG-4101 and 4102.</p>	<p>It is noted that internal project roadways were under construction at the time of the audit. It is recommended that roadways be constructed as per the design specification, which provides for all-weather roadways.</p> <ul style="list-style-type: none"> b) Parking and laydown areas are established on site. There was no evidence of workers parking on public roads within the vicinity of the project. c) From visual observations it does not appear that the capacity of existing roadside drainage network has been reduced. Works are currently underway to improve road width and drainage. d) Laydown areas are established for turn in / turn-out. e) From visual observations vehicles leaving site are generally clean and there was no visible dirt/mud being tracked onto the public road network. Site access is with all-weather roads, sealed access road and sealed hardstand to minimise any dirt being tracked from site. <p>Auditor recommendation The proposed vehicle wash-down facility and vibration grid (which was observed on site) be installed as per the Erosion and Sediment Control Plan.</p>	
Traffic management plan				
7	Prior to commencing the road upgrades required by condition 5 of Schedule 3 of this consent, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and	<p><u>Preparation</u> Correspondence from the Department to the Proponent, dated 11 September 2020, regarding review and approval of the Traffic Management Plan required by this condition.</p>	<p>Preparation: The TMP has been prepared in consultation with the relevant agencies and has been approved by the Secretary.</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>Council, and to the satisfaction of the Secretary. This plan must include:</p> <ul style="list-style-type: none"> (a) details of the transport route to be used for all development-related traffic; (b) a protocol for undertaking independent dilapidation surveys to assess the: <ul style="list-style-type: none"> • existing condition of Bodells Lane and Blands Lane prior to construction, upgrading or decommissioning activities; and • condition of Bodells Lane and Blands Lane following construction, upgrading or decommissioning activities; (c) a protocol for the repair of Bodells Lane and Blands Lane if dilapidation surveys identify these roads to be damaged during construction, upgrading or decommissioning works; (d) details of the road upgrade works required by condition 5 of Schedule 3 of this consent; (e) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including: <ul style="list-style-type: none"> • temporary traffic controls, including detours and signage; • notifying the local community about project-related traffic impacts; • procedures for receiving and addressing complaints from the community about development-related traffic; • minimising potential for conflict with school buses and other motorists as far as practicable; 	<p><i>West Wyalong Solar Farm Traffic Management Plan (TMP)</i>, Revision 3, dated 04 September 2020, prepared by pitt&sherry.</p> <p>Road upgrades commenced 17 July 2021.</p> <p>The requirements of this condition were satisfactorily identified within the following sections of the TMP:</p> <ul style="list-style-type: none"> a) TMP s.5.1 b) TMP s.6.2 c) TMP s.6.2 d) TMP s.6.1 e) TMP s.5.3, 5.4, 6.4, & 7. f) TMP Appendix B g) TMP s.7.1 and Appendix A h) TMP Appendix C. <p>Section 1.1 of the TMP identified where each relevant Condition of Consent is addressed in the TMP.</p>	<p>The TMP was approved by the Secretary 10 months prior to the commencement of road upgrades.</p> <p>The TMP is a well-written document with clear responsibilities and processes that adequately addresses the requirements of this condition. No issues or opportunities for improvement were identified by the auditor during the documentation review.</p> <p>Auditor Recommendation: That the Driver's Code of Conduct be updated to include or specifically reference the designated vehicle access routes set out within the Traffic Management Plan.</p>	

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> • minimising dirt tracked onto the public road network from development-related traffic; • dust management along Bodells Lane and Blands Lane, including: <ul style="list-style-type: none"> - application of a dust suppressant; and - a 50 km per hour speed limit for development related heavy vehicles using Bodells Lane and Blands Lane; • details of the employee shuttle bus service and measures to ensure employee use of this service; • scheduling of haulage vehicle movements to minimise convoy length or platoons; • responding to local climate conditions that may affect road safety such as fog, dust, wet weather and flooding; • responding to any emergency repair or maintenance requirements; and • a traffic management system for managing over-dimensional vehicles; <p>(f) a driver's code of conduct that addresses:</p> <ul style="list-style-type: none"> • travelling speeds; • driver fatigue; • procedures to ensure that drivers adhere to the designated transport routes and speed limits; and • procedures to ensure that drivers implement safe driving practices; <p>(g) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; and</p>			

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(h) a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding.			
	Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.	<p>Implementation: Road Occupancy Licence No. 1654058 issued for Bodells Lane/Newell Highway. Long-Term closure for road subgrade, drainage and re-surfacing works.</p> <p>TGS prepared by Traffic Southern Cross for Bodells Lane/Newell Highway Long-Term closure. Plan No. 3266 Rev 1 02/07/2021.</p> <p>TGS for Blands Lane short-term half road closure, 2 x traffic controllers, prepared by Traffic Southern Cross, Plan No. 3339.2 dated 03/08/2021.</p> <p>Correspondence from Bland Shire Council 04/08/2021 indicating approval of traffic control plans for Blands Lane and approval to proceed with work. Haulage schedule – discussed at pre-start. Daily email from Lojix (logistic company) regarding deliveries to site. Approved dedicated heavy vehicle route.</p> <p>Sighted example email 20/0/2021 and 21/10/2021. 8 truck deliveries scheduled for today. Sighted Tuesday 19 October email for 8 deliveries, which matched the site security register.</p> <p>Dilapidation Report prepared by ANKN Engineering Consultants Pty Ltd, dated 28/08/2021.</p> <p>Discussion held Jamie Harwood, Engineering Manager, at Bland Shire Council with regard to managing the distribution of communication to residents.</p> <p>Complaints register.</p>	<p>Implementation A Road Occupancy Licence was obtained for the Bodells Lane/Newell Highway works. Council approval was obtained for road upgrade works along Blands Lane.</p> <p>Evidence is available to generally support the implementation of the Traffic Management Plan on site, including Driver's Code of Conduct, traffic controls on site, posted speed limits and correspondence with council. A complaints register is also maintained. Two complaints have been recorded in the complaints register which relate to traffic management issues. Both have been effectively resolved by the project team.</p> <p>Auditor recommendation: EPC contractor provide project updates to residents and businesses within 2 km of the Project in accordance with the Traffic Management Plan.</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Landscaping				
Vegetation buffer				
8	<p>The Applicant must establish and maintain a mature vegetation buffer and infill planting (landscape screening) at the locations outlined in the figure in Appendix 1 to the satisfaction of the Secretary. This vegetation buffer must:</p> <ul style="list-style-type: none"> (a) be planted prior to commencing operations; (b) be comprised of species that are endemic to the area; (c) be established within 3 years of commencing operations; and (d) be properly maintained with appropriate weed management, unless the Secretary agrees otherwise. 	<p>Site observations 20 – 22 October 2021.</p> <p>Discussions with the Site Safety Advisor and Construction Manager, planting for landscape screening has not yet commenced.</p> <p>Existing mature vegetation remains (sighted).</p>	<p>At the time of this audit the requirements of this condition have not yet been triggered.</p> <p>Actions to address the requirements of this condition are required to be implemented as per planned arrangements.</p>	Not triggered.
Landscaping plan				
9	<p>Prior to commencing construction, the Applicant must prepare a detailed Landscaping Plan for the development to the satisfaction of the Secretary. This plan must include:</p> <ul style="list-style-type: none"> (a) a description of measures that would be implemented to ensure that the vegetated buffers achieve the objectives of condition 8 (a) – (d) above; (b) a program to monitor and report on the effectiveness of these measures; and (c) details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for the completion of actions. 	<p>Correspondence from Department to Proponent, dated 04 September 2020, regarding the approval of the Landscaping Plan (Revision H, dated 25 August 2020).</p> <p><i>West Wyalong Solar Farm Landscape Plan</i>, Revision H, dated 25 August 2020.</p> <p>The requirements of this condition are addressed within the following drawings (DWG) of the Landscaping Plan:</p> <ul style="list-style-type: none"> a) DWG L05 b) DWG L05 c) DWG L03 	<p>A Landscaping Plan was prepared and approved almost one year prior to commencement of construction. The Landscaping Plan adequately addressed the requirements of this condition and clearly identifies roles, responsibilities and tasks.</p> <p>No issues or opportunities for improvement were identified by the auditor during the documentation review.</p>	Compliant.
	<p>Following the Secretary's approval, the Applicant must implement the Landscaping Plan.</p>	<p>Site inspections observations.</p> <p>Discussion with PCL Construction Manager.</p>	<p>The PCL Construction Manager reported that no landscaping works had been undertaken at the time of this audit and thus the implementation of the plan had not yet been triggered.</p>	Not triggered.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Land management				
10	The Applicant must maintain the agricultural land capability of the site, including: <ul style="list-style-type: none"> (a) establishing the ground cover of the site within 3 months following any construction or upgrading; (b) properly maintaining the ground cover with appropriate perennial species and weed management; and (c) maintaining grazing within the development footprint, where practicable, unless the Secretary agrees otherwise. 	<i>West Wyalong Solar Farm Landscape Plan</i> , Revision H, dated 25 August 2020.	The Landscape Plan includes a Vegetation Management Program. <ul style="list-style-type: none"> a) Construction commenced 07 August 2021 and remains ongoing at the time of this audit, requirement of this condition not yet triggered. b) Ground cover is generally well maintained, with the exception of site access roads. c) Currently under construction and no grazing on the development footprint. The requirements of this condition are considered to apply to the operational phase of the project.	Not triggered
Biodiversity				
Vegetation clearance				
11	The Applicant must minimise the clearing of native vegetation and fauna habitat located within the Myers Lane road reserve through detailed design of the transmission line.	Discussion with PCL Construction Manager. Site observations. Biodiversity Management Plan – Appendix 3 – Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines.	The PCL Construction Manager reported that detailed design of the transmission line is currently underway but not finalised and is being designed in accordance with the Essential Energy C2010 Operational Procedure: Vegetation Clearing Guidelines for New Power Lines, as per the Biodiversity Management Plan. No clearing had been undertaken within the Myers Land Road Reserve at the time of the audit site inspection.	Not triggered.
Biodiversity offsets				
12	Within two years of commencing development under this consent, the Applicant must retire biodiversity credits of a number and class specified in Table 1 of the Consent Conditions to the satisfaction of BCS, unless the Secretary agrees otherwise.	Discussion with PCL Construction Manager. Discussion with LSbp Principal Environmental Planner.	Methods for biodiversity offsets are currently being investigated by the LSbp project team but had not been finalised at the time of this audit. LSbp is still within the two year timeframe to achieve compliance with this condition and as such it is considered not triggered at the time of this audit.	Not triggered.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1																			
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status															
	<p>The retirement of these credits must be carried out in accordance with the <i>NSW Biodiversity Offsets Policy for Major Projects</i> and can be achieved by:</p> <ul style="list-style-type: none"> (a) acquiring or retiring 'biodiversity credits' within the meaning of the <i>Biodiversity Conservation Act 2016</i>; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. <p>Table 1: Ecosystem Credit Requirements</p> <table border="1"> <thead> <tr> <th>Vegetation Community</th> <th>PCT ID</th> <th>Credits Required</th> </tr> </thead> <tbody> <tr> <td>Weeping Myall open woodland of the Riverina Bioregion and NSW South Western Slopes Bioregion</td> <td>26</td> <td>5</td> </tr> <tr> <td>Belah woodland on alluvial plains and low rises in the central NSW wheatbelt to Pilliga and Liverpool Plains regions</td> <td>55</td> <td>41</td> </tr> <tr> <td>Western Grey Box tall grassy woodland on alluvial loam and clay soils in the NSW South Western Slopes and Riverina Bioregions</td> <td>76</td> <td>2</td> </tr> <tr> <td>Blue Mallee - Bull Mallee - Green Mallee very tall mallee shrubland of the West Wyalong region, NSW South Western Slopes Bioregion</td> <td>177</td> <td>13</td> </tr> </tbody> </table>	Vegetation Community	PCT ID	Credits Required	Weeping Myall open woodland of the Riverina Bioregion and NSW South Western Slopes Bioregion	26	5	Belah woodland on alluvial plains and low rises in the central NSW wheatbelt to Pilliga and Liverpool Plains regions	55	41	Western Grey Box tall grassy woodland on alluvial loam and clay soils in the NSW South Western Slopes and Riverina Bioregions	76	2	Blue Mallee - Bull Mallee - Green Mallee very tall mallee shrubland of the West Wyalong region, NSW South Western Slopes Bioregion	177	13			
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Biodiversity management plan																			

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
13	<p>Prior to the commencement of construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCS, and to the satisfaction of the Secretary. This plan must:</p> <p>(a) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> • managing the remnant vegetation and fauna habitat on site; • protecting vegetation and fauna habitat outside the approved disturbance areas; • minimising the clearing of native vegetation and fauna habitat within the Myers Lane road reserve; • minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; • minimising the impacts to fauna on site and implementing fauna management protocols; • avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; • rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area; • maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and • controlling weeds and feral pests; <p>(b) include a fauna monitoring and management protocol, including identification and reporting of fauna mortalities to BCS; and</p>	<p>Biodiversity Management Plan (BMP), West Wyalong Solar Farm, prepared by OzArk Environment and Heritage, November 2020, V 3.0 (Final).</p> <p>Correspondence from Department to Proponent, dated 21 December 2020, approving the BMP (V3).</p> <p>The requirements of this condition are addressed within the following sections of the BMP:</p> <p>a) s.4 and s.5;</p> <ul style="list-style-type: none"> • Table 4.1 and Protocols 12 & 13; • Table 4.1 and Protocols 12 & 13; • Table 4.1, s.5 and Protocol 13; • Table 4.1 and Protocols 12 & 13; • Table 4.1 and Protocols 5, 12 & 13; • Protocol 1; • Table 4.1; • Protocol 3; • Table 4.1; <p>b) Table 4.2</p> <p>c) Section 1.5, Table 4.1 and Table 4.2.</p> <p>E309343-RBG-CIV-DWG-4750 Stormwater Details – Sheet 01 of 2. For Construction, showing the design for the rock ford crossings.</p>	<p>A Biodiversity Management Plan (BMP) was prepared, in consultation with BCS, and approved by the Secretary eight (8) months prior to commencement of construction.</p> <p>Section 1.6 of the BMP provides details of consultation with BCS with regard to the development of the BMP.</p> <p>The BMP appears current and applicable to the project.</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.			
	<p>Following Secretary's approval, the Applicant must implement the Biodiversity Management Plan.</p> <p>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biobanking Stewardship Agreement.</p>	<p>Site observation 20 October 2021.</p> <p>Habitat Tree Removal, Habitat Box Procedure and Management of displaced fauna</p> <ul style="list-style-type: none"> Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist. <p>Re-use of woody debris Site observation 20 October 2021. Coarse woody debris remained insitu or had been stockpiled on site adjacent the site compound.</p> <p>Weed Management</p> <ul style="list-style-type: none"> LSbp Environmental Planner and PCL HSE Manager reported that herbicide application was undertaken by Nigel Duncan from Duncan Contracting and Mechanical on the 15th and 	<p>With the exception of the non-conformance identified below in relation to the 'Bee Tree' incident, the Biodiversity Management Plan now generally appears to be implemented on site, including habitat clearing, nest box installation, no-go exclusion zones, sediment and erosion control and weed management. Site perimeter fencing had not been installed at the time of the audit.</p> <p>Non-Compliant Environmental protection measures listed in Tables 4-1 and 4-2 were generally observed implemented during the audit site inspection, including no-go zones, sediment and erosion control, inspection of work areas. However, based on the reported incident (Refer to Self-Reported Non-conformance below), the ecologist was not present during all vegetation clearing on site, no-go zones were not established prior to clearing commencing, and vegetation clearing was not monitored to ensure compliance which is not consistent with the mitigation measures</p>	<p>Non-compliant WWSF IEA NC 01.</p>

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>16th of September 2021, as per the Nutrien Ag Solutions report (sighted). Herbicide was applied to the majority of the stie, though some areas could not be sprayed due to the pinning of piles. PCL has confirmed a Herbicide Application Report has been completed (including chemicals applied, spray rates, water usage, wind speed etc.) however this has not yet been provided to PCL.</p> <ul style="list-style-type: none"> • ChemCert accreditation for weed management technician Nigel Duncan (expiry 21 March 2023). • SDS for Amicide Advance 700 Selective Herbicide. • SDS for FallowBoss® Tordon® Herbicide. • Nutrient Ag Solutions – West Wyalong – broadleaf weed recommendations, dated 03 September 2021. • Weed management has been undertaken on site and no weeds were visible to the auditor during the site inspection. The auditor is not an expert at weed identification. <p>Feral Pest Management</p> <ul style="list-style-type: none"> • No feral pest management activities had been undertaken on site at the time of the audit. <p>Fence construction and management</p> <ul style="list-style-type: none"> • Drawing: E309343-RBG-ST-SWG-4815 – Isolation Fence Panels details. • Drawing: E309343-RBG-ST-SWG-4814 – Opening double gates details. • Drawing: E309343-RBG-ST-SWG-4812 – Structural Fence details. • Drawing: E309343-RBG-ST-SWG-4300 – Overall layout plan, including fence details. 	<p>provided within Table 4-1 and thus non-compliant with the implementation requirements of this condition.</p> <p>Self-reported Non-compliance SR NC1 The proponent has self-reported a non-compliance with Condition 19 and 20 of SSD 9504 to the Department and other relevant agencies and stakeholders with regard to the Bee Tree Incident on 23 August 2021. Investigations into the non-compliance remain ongoing, however it is apparent that no-go fencing was not installed by the Construction Contractor prior to construction activities commencing and therefore the requirements of the Protocol 13 of the Biodiversity Management Plan were not complied with.</p> <p>Auditor Recommendation: No-go fencing to be installed in all remaining non-active construction areas (e.g. Myers Lane) to ensure it is effectively in place prior to construction activities commencing in these areas.</p> <p>Opportunity for Improvement. That a process be established to restrict access to the 10 m buffer adjacent to the waterway and ensure crossing of this waterway is restricted to the designated road way crossing.</p> <p>Opportunity for Improvement. That PCL obtains and maintains a record of the Herbicide Application Report once received from Duncan Contracting and Mechanical.</p>	

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>Erosion and sediment control</p> <ul style="list-style-type: none"> • Site Observations 20 October 2021 • Erosion and Sediment controls appear to have been established in accordance with the site erosion sediment control plan. <p>Lighting design protocol</p> <ul style="list-style-type: none"> • Discussion with PCL Construction Manager. • Site observations 20 – 22 October 2021 • No lighting has been installed or in use on site at the time of this audit. <p>Chemical Management</p> <ul style="list-style-type: none"> • Site observations 20 – 22 October 2021 • No chemicals were observed outside of bunded areas. All chemicals on site were stored within the site compound within dedicated chemical storage locations. <p>Dust control</p> <ul style="list-style-type: none"> • Site observations 20 – 22 October 2021 • Water cart observed in operation throughout the day. • No dust control issues identified. <p>Vegetation clearing procedure</p> <ul style="list-style-type: none"> • Site observations 20 – 22 October 2021 <p>No-go zone.</p> <ul style="list-style-type: none"> • Site observations 20 – 22 October 2021. No go fencing was observed installed in the locations provided for within the BMP. • Bee Tree Incident Investigation Report, prepared by PLC Constructor Pacific Rim Pty 		

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Ltd, 23 August 2021 (Rev 2 – Final) (received 06/09/2021).		
Amenity				
Construction, upgrading and decommissioning hours				
14	<p>Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between:</p> <ul style="list-style-type: none"> (a) 7am to 6pm Monday to Friday; (b) 8am to 1pm Saturdays; and (c) at no time on Sundays and NSW public holidays. <p>The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary:</p> <ul style="list-style-type: none"> • activities that are inaudible at non-associated receivers; • the delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or • emergency work to avoid the loss of life, property and/or material harm to the environment. 	<p>Discussion with Site Safety Advisors. Discussion with PCL Construction Manager. Construction Daily Pre-start Briefing (Attended by Auditor on 21 and 22 October 2021).</p> <p>HSE orientation PCL New Employee form. Site Project Health, Safety and Environment Plan, Version 1 dated 03 June 2021.</p> <p>One entry on the Complaint Register relates to deliveries being completed on a Sunday. This was an informal notification received from Bland Shire Council. Follow up investigation by PCL identified that two heavy vehicles delivered a road grader and bulldozer for the road upgrade works. The PCL Construction Manager considered this to be activities that are inaudible at non-associated receivers, however following receipt of the complaint a direction was given for no deliveries / construction activities on Sundays.</p>	<p>Construction hours are defined within the Site Induction Presentation. Site pre-start meeting is held at 7am and no works are to commence prior to this meeting.</p> <p>It was reported that all works to date have been undertaken within the designated construction hours.</p> <p>Auditor Recommendation: It is recommended that construction work hours be included within the Environmental Management Strategy, Site HSE Plan and within the worker induction/orientation checklist to ensure it is adequately communicated to workers.</p>	Compliant.
Noise				

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
15	The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on the site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version.	<p>West Wyalong Solar Farm Noise Impact Assessment, Rev 1 dated 30 November 2018 prepared by SLR Consulting Australia Pty Ltd</p> <p>Complaints Register - No noise complaints.</p> <p>Site HSE Plan, Section 11.2.2 Hearing Protection.</p> <p>Observations during site inspection, including:</p> <ul style="list-style-type: none"> • Works within approved hours. • Works within approved site boundary. • Plant and equipment turned off when not in use. 	<p>The noise impact assessment submitted as part of the Environmental Impact Assessment concluded that no exceedances of the project noise management levels are predicted at any of the surrounding residential receivers during any of the works due to the significant distance between the works and the receivers. As such, the Noise Impact Assessment nominates that there is no requirement to apply any specific noise mitigation measures, other than standard best practice measures where appropriate.</p> <p>On the basis that no complaints have been reported or received, the project is generally considered compliant with the requirements of this condition.</p>	Compliant.
Dust				
16	The Applicant must minimise the dust generated by the development.	<p>Observations during site inspection, including:</p> <ul style="list-style-type: none"> • Water cart in operation. • Groundcover maintained where practical and possible. • 40km speed limit on site access road and 60km limit on Blands Lane. 	<p>On the basis that no dust related complaints have been reported or received, the project is generally considered compliant with the requirements of this condition.</p> <p>No dust related issues were observed during the audit site inspection.</p>	Compliant.
Visual				
17	The Applicant must: <ul style="list-style-type: none"> (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection from the solar panels; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and 	<p>Discussion with LSBP Senior Environmental Planner</p> <p>Site inspection.</p> <p>Project design documentation</p> <p>Proponent confirmed Project designs have incorporated relevant measures to address potential visual impacts.</p>	<ul style="list-style-type: none"> (a) Glare is not typically associated with solar panels. (b) Ancillary infrastructure is still being finalised. (c) No advertising signs were observed displayed at the time of the audit. (d) On the basis of the above and that no 'visual' complaints have been reported or received, the project is generally considered compliant with the requirements of this condition at the 	Not triggered.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.		time of the audit, noting that ancillary infrastructure designs are still being finalised.	
Lighting				
18	<p>The Applicant must:</p> <p>(a) minimise the off-site lighting impacts of the development; and</p> <p>(b) ensure that all external lighting associated with the development:</p> <ul style="list-style-type: none"> is installed as low intensity lighting (except where required for safety or emergency purposes); does not shine above the horizontal; and complies with <i>Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting</i> or its latest version. 	<p>Discussion with PCL Construction Manager</p> <p>Discussion with PCL Safety Advisors.</p> <p>Biodiversity Management Plan (Protocol 9).</p>	<p>A Lighting Design Protocol is included within the Biodiversity Management Plan (Protocol 9), which outlines Best Practice Lighting Design Considerations from the National Light Pollution Guidelines for Wildlife.</p> <p>No lighting installed on site at the time of the audit. No plans for lighting at this stage. On the basis that no light related complaints have been reported or received, the project is generally considered compliant with the requirements of this condition at this stage of the development.</p>	Compliant.
Heritage				
Protection of heritage items				
19	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 3 or located outside the approved development footprint.	<p><i>West Wyalong Solar Farm Heritage Management Plan</i>, Revision 10, prepared by Artefact, dated 15 October 2020.</p> <p>Correspondence from Department to Proponent, dated 09 November 2020, RE: Approval of the Heritage Management Plan (Revision 10, dated 15 October 2020).</p> <p>Abortist Report</p>	<p>Self-Reported - Non-compliance</p> <p>The proponent has self-reported a non-compliance with the requirements of this condition to the Department and other relevant agencies and stakeholders.</p> <p>A direct impact has occurred to an Aboriginal heritage item identified in Table 1 of Appendix 3</p>	<p>Self-Reported - Non-Compliant</p> <p>Bee Tree incident.</p> <p>AHIMS ID 43-4-0058.</p> <p>(SR NC 01)</p>

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>WWSF Bee Tree (AHIMS Number 43-4-0058) Scarred Tree</p> <ul style="list-style-type: none"> Arborist Tree Protection report 14 June 2021. Modified management plan appended to the heritage management plan. Submitted to the department but not approved. Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist. <p>16 August Ecologist assessment prior to removal.</p> <p>Week 23/08 – Ecologist on site clearance commenced, focused on habitat trees. Ecologist left site and non-habitat tree felling continued. Bee tree felled just after midday 23 August 2021.</p> <p>Notification of incident</p> <ul style="list-style-type: none"> DPIE notification (verbally and on Major project portal 24/08. EPA notified by EPA notification line. Automatic reply from major projects portal 24/08 referencing DA and SSD9540-PA15 Heritage report – 202103158 24/08 11am. Notification to LALC (Linton 28/08). Meeting on site (30/08) Heritage consultant notified. 30/08 On-site inspection with construction team, LSbp and LALC. <p>RFI (27 August) Heritage RFI (30 August) DPIE</p> <ul style="list-style-type: none"> Correspondence from Proponent to the Department, dated 06 September 2021, re: 	<p>of the Consent, namely a WWSF Bee Tree, AHIMS number 43-4-0058, identified as a scarred tree.</p> <p>Early investigations by the project team indicate that as a result of 'no go' fencing not being erected around the Bee Tree and the Bee Tree being incorrectly identified for removal, clearing operations on the 23rd of August 2021, resulted in direct impact to the Bee Tree (AHIMS ID 43-4-0058) causing non-compliance with the requirements of this condition.</p> <p>At the time of this audit, NSW DPIE, Heritage NSW and West Wyalong LALC are investigating the incident and as such the auditor declines to make recommendations with regard to the incident.</p> <p>SSD 9504 Schedule 4, Condition 5b states that 'A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance'.</p>	

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>West Wyalong Solar Farm Project - Investigation into self-report of Harm to Aboriginal Object at 18/DP753081 Myers Lane, West Wyalong (Bee Tree Incident).</p> <ul style="list-style-type: none"> Correspondence from Proponent to the BCS dated 06 September 2021, re: West Wyalong Solar Farm Project - Investigation into self-report of Harm to Aboriginal Object at 18/DP753081 Myers Lane, West Wyalong (Bee Tree Incident). Bee Tree Incident Investigation Report, prepared by PLC Constructor Pacific Rim Pty Ltd, 23 August 2021 (Rev 2 – Final) (received 06/09/2021). Memo Report RE: Site visit to West Wyalong Solar Farm 30 – 31 August 2021 prepared by Artefact. <p>Show cause notice issued by NSW DPIE to LSbp dated 21 September 2021. LSBP response issued to Department 06 October 2021.</p> <p>NSW DPIE Show Cause notice issued to PCL 11 October 2021, with response due by 25 October 2021.</p> <p>Department due to return to site</p> <ul style="list-style-type: none"> Rehabilitation Management Plan for “Bee Tree” Belah Casuarina cristata’ prepared by Tony Manus following the incident. <p>WWSF AS01 (AHIMS Number 43-4-0057) Artefact Scatter:</p> <ul style="list-style-type: none"> Memo Report RE: Salvage of Aboriginal Objects, prepared by Artefact, 04 March 2021. This memo provides documentation regarding the salvage of Aboriginal artefacts within WWSF AS01, with the exception of those 		

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<p>within the vicinity of the no-go zone around the Bee Tree.</p> <ul style="list-style-type: none"> Correspondence from Proponent to the Department, dated 06 September 2021, re: West Wyalong Solar Farm Project - Investigation into self-report of Harm to Aboriginal Object at 18/DP753081 Myers Lane, West Wyalong (Bee Tree Incident). Bee Tree Incident Investigation Report, prepared by PLC Constructor Pacific Rim Pty Ltd, 23 August 2021 (Rev 2 – Final) Memo Report RE: Site visit to West Wyalong Solar Farm 30 – 31 August 2021 prepared by Artefact. 		
19A	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 3, the Applicant must salvage and relocate the item/s that would be impacted and obtain a Care Agreement for the transfer and safekeeping of artefacts to the West Wyalong Local Aboriginal Land Council.</p> <p>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 3.</p>	<p>WWSF IF01 (AHIMS Number 43-4-0056) Isolated Artefact:</p> <ul style="list-style-type: none"> Memo Report RE: Salvage of Aboriginal Objects, prepared by Artefact, 04 March 2021. This memo provides documentation regarding the salvage of Aboriginal artefacts within WWSF AS01. Correspondence from Heritage NSW to West Wyalong Local Aboriginal Land Council RE: West Wyalong Solar Farm Aboriginal Objects Care Agreement 4658, dated 19 October 2020. <p>WWSF IF02 AHIMS Number 43-4-0071) Isolated Artefact:</p> <ul style="list-style-type: none"> Memo Report RE: Salvage of Aboriginal Objects, prepared by Artefact, 04 March 2021. This memo provides documentation regarding the salvage of Aboriginal Artefacts. Correspondence from Heritage NSW to West Wyalong Local Aboriginal Land Council RE: West Wyalong Solar Farm Aboriginal Objects Care Agreement 4658, dated 19 October 2020. 	<p>The proponent has self-reported a non-compliance to the Department with regard to the disturbance to artefact scatter AHIMS ID 43-4-0057.</p> <p>At the time of this audit, NSW DPIE, Heritage NSW and West Wyalong LALC are investigating the incident and as such the auditor declines to make recommendations with regard to the incident.</p> <p>SSD 9504 Schedule 4, Condition 5b states that ‘A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance’..</p> <p>An Aboriginal Objects Care Agreement 4658 was obtained 20 October 2020 and Aboriginal artefacts IF01 and IF02 were successfully salvaged in accordance with the requirements of this condition. As per Artefact Heritage’s Memo Report RE: Salvage of Aboriginal Objects, the salvage of Aboriginal objects was carried out on</p>	<p>Non-Compliant Bee Tree incident. AHIMS ID 43-4-0057. (SR NC 02)</p>

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			one day (23 February 2021) with participants from West Wyalong LALC, Young LALC, Didge Ngunnawal Clan and Artefact Heritage. Limitations to the effectiveness of the salvage are expressed within the Memo Report. A total of 13 lithic Aboriginal Objects were retrieved.	
Heritage management plan				
20	<p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders; (c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • protecting the Aboriginal heritage items identified in Table 1 of Appendix 3 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction; • salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 3; • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - previously unidentified heritage 	<p><i>West Wyalong Solar Farm Heritage Management Plan, Revision 10, prepared by Artefact, dated 15 October 2020.</i></p> <p>Correspondence from Department to Proponent, dated 09 November 2020, RE: Approval of the Heritage Management Plan (Revision 10, dated 15 October 2020).</p> <ul style="list-style-type: none"> a) Correspondence from the Department to Pitt & Sherry (Operations) Pty Ltd RE: West Wyalong Solar Farm (SSD 9504) Request for endorsement to prepare Heritage Management Plan. The Secretary endorsed Michael Lever of Artefact Heritage to prepare a Heritage Management Plan. b) <i>West Wyalong Solar Farm Heritage Management Plan, Revision 10, prepared by Artefact, dated 15 October 2020 – Appendix 4: Heritage NSW comments on Heritage Management Plan; Appendix 5 – RAP Consultation Log.</i> c) The requirements of this condition are addressed within the following sections of the Heritage Management Plan: <ul style="list-style-type: none"> • S.6.1.1.3 	<p>A Heritage Management Plan was prepared, in consultation with relevant parties, and approved by the Secretary nine (9) months prior to commencement of construction.</p> <p>The Heritage Management Plan generally meets the documentation requirements of this condition.</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>items are found; or Aboriginal skeletal material is discovered;</p> <ul style="list-style-type: none"> - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and - ongoing consultation with Aboriginal stakeholders during the implementation of the plan; <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p>	<ul style="list-style-type: none"> • S.6.1.1.1 & S.6.1.1.2 • S.6.1.2.6, S.6.2.1, S6.2.2, S6.2.3 and Appendix 3. <p>d) The requirements of this condition are addressed within S.6.1.3, S.6.1.4, S.6.1.2.3 and S 6.1.2. of the Heritage Management Plan.</p>		
	<p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	<p>Artefact collection:</p> <ul style="list-style-type: none"> • Memo Report RE: Salvage of Aboriginal Objects, prepared by Artefact, 04 March 2021. This memo provides documentation regarding the salvage of Aboriginal objects from the project site. <p>Care Agreement:</p> <ul style="list-style-type: none"> • Correspondence from Heritage NSW to West Wyalong Local Aboriginal Land Council RE: West Wyalong Solar Farm Aboriginal Objects Care Agreement 4658, dated 19 October 2020. <p>No Go Zones:</p> <ul style="list-style-type: none"> • Self-reported non-conformance - Bee Tree incident. <p>Consultation with RAP:</p> <ul style="list-style-type: none"> • The West Wyalong Local Aboriginal Land Council have been engaged in consultation in relation to this project. <p>Heritage Induction:</p> <ul style="list-style-type: none"> • Heritage induction with LALC RAP organised for 03/11/2021. This has been delayed due to Covid concerns. <p>Unexpected finds:</p>	<p>An Aboriginal Objects Care Agreement 4658 was obtained 20 October 2020 and Aboriginal artefacts IF01 and IF02 were successfully salvaged in accordance with the requirements of this condition.</p> <p>As per Artefact Heritage's Memo Report RE: Salvage of Aboriginal Objects, the salvage of Aboriginal objects was carried out on one day (23 February 2021) with participants from West Wyalong LALC, Young LALC, Didge Ngunnawal Clan and Artefact Heritage. Limitations to the effectiveness of the salvage are expressed within the Memo Report. A total of 13 lithic Aboriginal Objects were retrieved.</p> <p>Self Reported - Non-compliance A direct impact has occurred to an Aboriginal heritage item identified in Table 1 of Appendix 3 of the Consent, namely a WWSF Bee Tree, AHIMS number 43-4-0058, identified as a scarred tree.</p> <p>Early investigations by the project team indicate that as a result of 'no go' fencing not being</p>	<p>Self-reported non-compliance. Bee Tree incident.</p> <p>(NC SR 1) (NC SR 2)</p>

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> Discussions with PCL Construction Manager and LSbp Senior Environmental Planner. No unexpected finds have been identified to date on the project. 	<p>erected around the Bee Tree and the Bee Tree being incorrectly identified for removal, clearing operations on the 23rd of August 2021, resulted in direct impact to the Bee Tree (AHIMS ID 43-4-0058) causing non-compliance with the requirements of this condition.</p> <p>At the time of this audit, NSW DPIE, Heritage NSW and West Wyalong LALC are investigating the incident and as such the auditor declines to make recommendations with regard to the incident.</p> <p>SSD 9504 Schedule 4, Condition 5b states that 'A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance'.</p>	
Soil and water				
Water supply				
21	<p>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.</p> <p><i>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.</i></p>	<p>Water use from local landholder (same landholder as the solar farm) which is used under exemption / or Licence provided by the Water Management (General) Regulation 2018.</p> <p>No water licences have been obtained for the development.</p> <p>Water has been used for dust suppression as part of the road upgrade works.</p> <p>Water has also been purchased from Goldenfields Water County Council (local water council/manager) for lime stabilisation as part of the road upgrades scope. Water receipt dated 16/08/2021.</p>	<p>Non-Conformance The Proponent has not obtained the necessary water licences for the development.</p> <p>Auditor recommendation: Proponent to obtain necessary water licences for the project.</p>	Non-compliant WWSF IEA NC 02.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Water pollution				
22	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	Site inspection observation 20 October 2020. Discussion with LSBP HSE Manager Discussion with PCL Safety Advisor Discussion with PCL Construction Manager.	It was reported that there has been no water pollution incidents or events on the project at the time of this audit. The auditor did not identify any evidence of water pollution in the standing water observed on the site at the time of the audit.	Compliant.
Operating conditions				
23	The Applicant must: <ul style="list-style-type: none"> ensure the solar panels and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on localised flooding and groundwater at the site; minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version; ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and ensure all works are undertaken in accordance with the following, unless DPIE Water agrees otherwise: <ul style="list-style-type: none"> Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018), or its latest version; and 	<ul style="list-style-type: none"> Discussion with EPC Contractor Construction Manager regarding the design and construction of the solar panels and ancillary infrastructure, including security fencing has considered and accounts for flooding and groundwater at the site. Sighted Structural designs and civil design drawings, correspondence 21/10/2021 were regard to design of Eastern Boundary fence. Erosion controls are established as per the site erosion sediment control plan. Discussion with EPC Contractor Construction Manager regarding the design and construction of the solar panels and ancillary infrastructure, including security fencing 	<p>Construction Environmental Management Plans and detailed Erosion and Sediment Controls plans have been established for the management environmental risks on the project. Erosion and sediment controls, such as sediment fencing and vegetated buffers were observed implemented on site.</p> <p>Structural and civil design drawings were available at the time of the audit and demonstrated that the design and construction of the solar panels and ancillary infrastructure, including security fencing has considered and accounts for flooding and groundwater at the site.</p> <p>Designs for waterway crossings are included within the Civil Drawings.</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> Policy and Guidelines for Fish Habitat Conservation and Management (2013), or its latest version. 			
Hazards				
Fire safety study				
24	<p>Prior to commencing construction of the battery storage facility, unless the Secretary agrees otherwise, the Applicant must prepare a Fire Safety Study of the development, to the satisfaction of FRNSW and the Secretary.</p> <p>The study must:</p> <p>(a) be consistent with the:</p> <ul style="list-style-type: none"> Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; and NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and <p>(b) describe the final design of the battery storage facility.</p> <p>Following the Secretary's approval, the Applicant must implement the measures described in the Fire Safety Study.</p>	<p>Discussion with PCL Construction Manager.</p> <p>Discussion with LSbp Senior Environmental Planner.</p>	<p>Construction of the Battery Storage Facility has not commenced and a Fire Safety Study has not yet been prepared for the development.</p> <p>The requirements of this condition have not yet been triggered.</p>	Not triggered.
Storage and handling of dangerous goods				

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
25	<p>The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with:</p> <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook if the chemicals are liquids. <p>In the event of an inconsistency between the requirements listed from (a) and (b) above, the most stringent requirement must prevail to the extent of the inconsistency.</p>	<p>Site inspection observations.</p> <p>Site compound, including designated self-bunded chemical containers and bunded location for refuelling.</p> <p>>10,000L fuel on site. 2000 PCL and 5000 TranEX.</p>	<p>Due to the early phase on construction there were minimal quantities of substances stored on site. Spill kits were observed on site. Substances are stored in the designated site laydown areas withing self-bunded chemical containers.</p> <p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit.</p>	Compliant.
Operating conditions				
26	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the fire risks of the development; (b) ensure that the development: <ul style="list-style-type: none"> • includes at least a 10 metre defensible space around the perimeter of the solar array area and battery storage areas that permits unobstructed vehicle access; • manages the defensible space and solar array areas as an Asset Protection Zone; • complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2006 (or equivalent) and Standards for Asset Protection Zones; and • is suitably equipped to respond to any fires on site including provision of a 45,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located adjacent to the internal access road; 	<p>Discussion with LSBP Senior Environmental Planner and PCL Construction Manager.</p> <p>Observations during audit site inspection.</p> <p>Revised project layout.</p> <p>Watercart on site and 2 x 22,500L water tanks installed at the site compound with Storz fitting.</p>	<p>This condition is considered to apply to operational activities rather than construction activities and as such the full requirements of this condition had not been triggered at the time of this audit.</p> <p>Nonetheless the site is managing the fire risks of the development through provision of water tanks, water cart and fire extinguishers.</p> <p>The project layout appears to accommodate a 10m defensible space around the site.</p>	Not triggered

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> (c) assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations. 			
Emergency plan				
27	<p>Prior to commissioning operations, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, to the satisfaction of FRNSW and the RFS. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times. The plan must:</p> <ul style="list-style-type: none"> (a) be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'; (b) identify the fire risks and controls of the development; and (c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site. <p>Following approval, the Applicant must implement the Emergency Plan for the duration of the development.</p>	Nil.	<p>Construction commenced 07 August 2021 and remains ongoing at the time of this audit.</p> <p>Commissioning operation have not commenced and as such the requirement of this condition has not yet been triggered.</p>	Not triggered.
Waste				

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
28	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; and (e) remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal. 	<p>Discussion with PCL Safety Advisor</p>	<p>Due to the early phase of construction activities on site there has been only limited generation of waste on site.</p> <p>A waste register is currently being established to capture details of waste removed from site. It was reported that no waste classification or offsite disposal has been required (all soils retained on site).</p> <p>It was reported that the site has not received or disposed of any waste on site.</p> <p>Due to time limitations, the auditor was not able to validate how waste generation is minimised. On the basis of no waste issues being identified during the audit site inspection, the site is generally considered compliant with the requirements of this condition.</p> <p>Auditor Recommendation: That recycling bins be provided and clearly identified within the site compound and that the site encourages the use of tap water rather than the reliance on bottled water.</p>	Compliant
Accommodation and employment strategy				
29	<p>Prior to commencing construction, the Applicant must prepare an Accommodation and Employment Strategy for the development in consultation with Council, and to the satisfaction of the Secretary. This strategy must:</p> <ul style="list-style-type: none"> (a) propose a strategy to ensure there is sufficient accommodation for the workforce associated with the development; (b) consider the cumulative impacts associated with other State significant development projects in the area; (c) investigate options for prioritising the employment of local workers for the 	<p>Accommodation and Employment Strategy (AES) – West Wyalong Solar Farm, Rev 02, 07 August 2020, prepared by pitt&sherry.</p> <p>Correspondence from NSW DPIE to LSbp, dated 24 August 2020, RE: approval of the Accommodation and Employment Strategy (Rev 2, dated 07 August 2020).</p> <p>A record of consultation with Bland Shire Council is maintained in Appendix A of the AES.</p> <p>The requirements of this condition are addressed in the following sections of the AES:</p> <ul style="list-style-type: none"> a) S.6 	<p>An Accommodation and Employment Strategy has developed, in consultation with Bland Shire Council, and approved by the Secretary one year prior to the commencement of construction.</p> <p>The Accommodation and Employment Strategy generally meets the documentation requirements of this condition and appears implemented on the project.</p> <p>Local contractors have been engaged to undertake road upgrade works and cleaning services on the project. The auditor and PCL</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1														
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status										
	<p>construction and operation of the development, where feasible; and</p> <p>(d) include a program to monitor and review the effectiveness of the strategy over the life of the development, including regular monitoring and review during construction.</p> <p>Following the Secretary's approval, the Applicant must implement the Accommodation and Employment Strategy.</p>	<p>b) S.3.4 c) S.5 d) S.7.</p> <p>Discussion with PCL Safety Advisor.</p>	Safety Advisor were staying in local hotel accommodation.											
Decommissioning and rehabilitation														
30	<p>Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant shall rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the below objectives in Table 2.</p> <p>Table 2: Rehabilitation Objectives</p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>Site</td> <td> <ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use </td> </tr> <tr> <td>Solar farm infrastructure</td> <td> <ul style="list-style-type: none"> To be decommissioned and removed, unless the Secretary agrees otherwise </td> </tr> <tr> <td>Land use</td> <td> <ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 3 Land Capability) </td> </tr> <tr> <td>Community</td> <td> <ul style="list-style-type: none"> Ensure public safety </td> </tr> </tbody> </table>	Feature	Objective	Site	<ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use 	Solar farm infrastructure	<ul style="list-style-type: none"> To be decommissioned and removed, unless the Secretary agrees otherwise 	Land use	<ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 3 Land Capability) 	Community	<ul style="list-style-type: none"> Ensure public safety 	<p>Construction commenced 07 August 2021 and remains ongoing at the time of this audit. Operations have not commenced and as such the requirement of this condition has not yet been triggered.</p>	Nil.	Not triggered.
Feature	Objective													
Site	<ul style="list-style-type: none"> Safe, stable and non-polluting Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use 													
Solar farm infrastructure	<ul style="list-style-type: none"> To be decommissioned and removed, unless the Secretary agrees otherwise 													
Land use	<ul style="list-style-type: none"> Restore land capability to pre-existing use (at least Class 3 Land Capability) 													
Community	<ul style="list-style-type: none"> Ensure public safety 													
Schedule 4	Environmental Management and Reporting													

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Management				
Environmental management strategy				
1	<p>Prior to commencing the development, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <ol style="list-style-type: none"> provide the strategic framework for environmental management of the development; identify the statutory approvals that apply to the development; describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; describe the procedures that would be implemented to: <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise; respond to any non-compliance; respond to emergencies; and include: <ul style="list-style-type: none"> references to any plans approved under the conditions of this consent; and a clear plan depicting all the monitoring to be carried out in relation to the development. <p>Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.</p>	<p>Environmental Management Strategy – West Wyalong Solar Farm, Rev 02, dated 27 July 2021, prepared by Pitt and Sherry.</p> <p>Correspondence from the Department approving the EMS (Rev 01), noting that the plan will need to be updated to incorporate all the monitoring required to be carried out in relation to the development.</p> <p>The EMS was updated as per Secretary for Planning requirements in letter of approval dated 13/08/2020</p> <p>The requirements of this condition are addressed within the following sections of the EMS:</p> <ol style="list-style-type: none"> S.3 S.2.2 S.3.3 <ul style="list-style-type: none"> S.6 S.6.3 S.6.4 S.5.1 S.5.2 and 5.3 <ul style="list-style-type: none"> S.3.1 S.7 and Appendix A. <p>PCL has established a HSE Plan. HSE Inspection Checklist.</p> <p>Recent inspections completed include:</p> <ul style="list-style-type: none"> Habitat boxes 07/10 Bee tree inspection 08/10 Blands Lane – Enviro 11/10 following rain. Blands Lane – Fences 11/10 Blands Lane / Bodell Rd Signage 12/10 	<p>An Environmental Management Strategy (EMS) was prepared and approved by the Secretary one (1) year prior to commencement of construction.</p> <p>EMS was updated as required by the approval 12 days prior to commencement of construction.</p> <p>A review of the EMS identified that it generally meets the documentation requirements of this condition.</p> <p>Evidence was available to generally support the implementation of the EMS on site, including:</p> <ul style="list-style-type: none"> Supporting management plans available on site. Records of site inductions Records of toolbox talks Records of daily pre-start meetings Records of site inspections. Records of complaints/enquiries. <p>The EPC Contractor has prepared an additional Site Health Safety and Environment Plan for implementation throughout the construction phase of the project.</p> <p>Non-compliant – Implementation of the CEMP The HSE Plan has been partially implemented on site, with requirements such as environmental risk register, project environmental checklist and site environmental inspections inconsistently completed and/or not completed in accordance with the HSE Plan (i.e. using a different checklist to the one nominated in the HSE Plan).</p>	<p>Non-compliant WWSF IEA NC 03</p>

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		<ul style="list-style-type: none"> - Piling activity – 13/10 - Enviro - Roads 15/10 - Enviro – Roads 18/10 - Chemical cabinets 18/10 - Rig inspection 19/10 - Laydown inspection 19/10. 	<p>The risk register provided does not adequately identify or assesses environmental aspects and impacts.</p> <p>Whilst site inspections are occurring on site, the completion of these is ad-hoc and the forms used for the inspections are inconsistent and/or informal. Inspection records were provided for October, however construction commenced in early August 2021.</p> <p>Auditor Recommendations:</p> <ul style="list-style-type: none"> • A detailed internal audit be promptly undertaken on the PCL HSE plan (as required by the CEMP) to verify the statements and procedures within the HSE Plan, verify implementation and to identify areas to streamline content to enable better interpretation and effective implementation on site. • The project risk register be reviewed and revised to adequately identify and assesses environmental aspects and impacts. • The implementation of the existing CEMP could be improved by establishing one concise monitoring and accountabilities schedule depicting all the relevant inspections, monitoring and reporting requirements as outlined within all project management plans, including frequency, type, person responsible, method/form, record(s) to be maintained and reporting requirements. • There are currently 2 mobile plant registers being maintained and it is recommended these be consolidated into one register covering all plant and 	

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
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			equipment on site, and that any identified gaps in on-boarding documentation, such as most recent maintenance records, be promptly rectified.	
Revision of Strategies, Plans and Programs				
2	<p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and;</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:</p> <ul style="list-style-type: none"> • submission of an incident report under condition 4 of Schedule 4; • submission of an audit report under condition 6 of Schedule 4; or • any modification to the conditions of this consent. 	<p>Discussion with LSbp Senior Environmental Planner.</p> <ul style="list-style-type: none"> - SSD 9504 Mod 1 dated 22/09/2021. 	<p>a) No upgrading or decommissions works had commenced at the time of the audit and as such the requirement of this condition had not yet been triggered.</p> <p>b) The Proponent confirmed that the EMS and supporting management plans have been/are currently being reviewed and may be revised as necessary following the outcome of the Bee Tree incident and following approval of SSD 9504 Modification 1.</p> <p>Auditor Recommendation:</p> <ul style="list-style-type: none"> • The EMS and supporting management plans, including the Construction Environmental Management Plan requires review and revision (where necessary) to address the outcomes of the reportable incident and to address relevant changes to the Development Consent following approval of Modification 1 to ensure compliance with Schedule 4, Condition 2 of the Development Consent. 	Compliant.
Updating and staging of Strategies, Plans and Programs				

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
3	<p>With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.</p> <p>With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • <i>While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.</i> • <i>If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</i> 	Discussion with LSbp Senior Environmental Planner	No management plans have been revised and submitted for approval at the time of this audit.	Not triggered.
Compliance				
Incident notification				
4	The 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	Notification of incident – Bee tree <ul style="list-style-type: none"> • DPIE notification (verbally and on Major project portal 24/08. EPA notified by EPA notification line. 	The notification of the Bee Tree Incident appears to have been undertaken in a manner consistent with the requirements of this condition.	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
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	<p>(including the development application number and the name of the development if it has one) and set out the location and nature of the incident.</p> <p>Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.</p>	<ul style="list-style-type: none"> Automatic reply from major projects portal 24/08 referencing DA and SSD9540-PA15 Heritage report – 202103158 24/08 11am. Notification to LALC (Linton 28/08). Meeting on site (30/08) Heritage consultant notified. 30/08 On-site inspection with construction team, LSbp and LALC. RFI (27 August) Heritage RFI (30 August) DPIE Correspondence from Proponent to the Department, dated 06 September 2021, re: West Wyalong Solar Farm Project - Investigation into self-report of Harm to Aboriginal Object at 18/DP753081 Myers Lane, West Wyalong (Bee Tree Incident). Bee Tree Incident Investigation Report, prepared by PLC Constructor Pacific Rim Pty Ltd, 23 August 2021 (Rev 2 – Final) (received 06/09/2021). Memo Report RE: Site visit to West Wyalong Solar Farm 30 – 31 August 2021 prepared by Artefact. Show cause notice issued by NSW DPIE to LSbp dated 21 September 2021. LSBP response issued to Department 06 October 2021. NSW DPIE Show Cause notice issued to PCL 11 October 2021, with response due by 25 October 2021. 		
Non-compliance notification				
5	<p>The Department Planning Secretary must be notified in writing via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set</p>	<ul style="list-style-type: none"> - WWSF Environmental Management Strategy. - Discussions with LSbp Senior Environmental Planner. - Correspondence from Proponent to the Department, dated 06 September 2021, re: West Wyalong Solar Farm Project - 	<p>With the exception of the above non-compliance, it was reported by the Proponent that there have not been any other non-compliances identified or reported at the time of this audit.</p>	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance. (Now 5A)	Investigation into self-report of Harm to Aboriginal Object at 18/DP753081 Myers Lane, West Wyalong (Bee Tree Incident).	Condition 5B applies to the non-compliances identified.	
5A	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	<ul style="list-style-type: none"> Correspondence from Proponent to the Department, dated 06 September 2021, re: West Wyalong Solar Farm Project - Investigation into self-report of Harm to Aboriginal Object at 18/DP753081 Myers Lane, West Wyalong (Bee Tree Incident). 	The no-compliance notification adequately addresses the requirements of this condition.	Compliant.
5B	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Noted.	LSbp separately reported a potential breach of Conditions 19 and 20 of Schedule 3 in addition to the non-compliance notified as an incident (Bee Tree).	Compliant.
Independent Environmental Audit				
6	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: <ol style="list-style-type: none"> within 3 months of commencing construction; and within 3 months of commencement of operations. 	This Independent Environmental Audit.	Construction commenced on 07 August 2021 and this Independent Environmental Audit was carried out on 20 October 2021, within 3 months of commencing construction.	Compliant.
6A	Proposed independent auditors be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Correspondence from NSW DPIE to LSbp, dated 16/08/2021, RE: Independent Environmental Audit Team Approval 2021.	Mr Peter Marshman of J2M Systems was endorsed by the Planning Secretary following request submitted on 09 August 2021.	Compliant.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
6B	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in condition 6 of Schedule 4 upon giving at least 4 weeks' notice to the Applicant of the date upon which the audit must be commenced.	Nil	The Auditor was not advised of any requirement to reschedule the audit.	Not triggered
6C	In accordance with the specific requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> , the Applicant must: <ul style="list-style-type: none"> (a) review and respond to each Independent Audit Report prepared under condition 6 of Schedule 4 of the consent, or condition 6B of Schedule 4 where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary unless otherwise agreed by the Planning Secretary. 	Nil	This is the first Independent Environmental Audit on the Project.	Not triggered.
6D	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 and site inspection as outlined in the <i>Independent Audit Post Approvals Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.	Nil	This is the first Independent Environmental Audit on the Project.	Not triggered.
6E	Notwithstanding the requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> , 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.		The Auditor was not advised of any requirement to cease the audit.	Not triggered.

Independent Environmental Audit Table

MCoA SSD 9504 MOD 1				
Condition #	Condition Text	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Access to information				
7	<p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> the EIS; the final layout plans for the development; current statutory approvals for the development; approved strategies, plans or programs required under the conditions of this consent; the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; how complaints about the development can be made; a complaints register; compliance reports; any independent environmental audit, and the Applicant's response to the recommendations in any audit; and any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	<p>https://www.lightsourcecbp.com/au/projects/west-wyalong-solar-project/</p> <p>Sighted Complaints register maintained by PLC.</p> <ul style="list-style-type: none"> WWSF01 20/07/2021 complaint by local resident – could not use intersection due to road closure. Construction Manager and Safety Manager met with resident 21/07/2021 and discussed access arrangements. WWSF02 22/09/2021 Wire fence damaged – Blands Lane. Construction manager met with landowner (22/09/2021) agreed to reinstate the fence. WWSF03 03/08/2021 Complaint to Bland Shire Council re: heavy vehicles travelling along Bodells Lane whilst the road was closed to traffic. 	<p>The LSbp project website was reviewed by the auditor throughout the audit period and was found to include, and thus make publicly available, the relevant information as required by this condition.</p> <p>Auditor recommendation: It is recommended that LSbp updates the online 'Feedback Register' to include the same information as the complaints register maintained by the EPC contractor on site. It is understood that there is some delays in the uploading of documentation to the website as this is done in London, UK.</p>	Compliant.

Independent Environmental Audit Table

Environmental Impact Statement

West Wyalong Solar Farm

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	Biodiversity			
Removal of trees – as per calculations based on BAM for Myers Lane (Case No. 00013377) and paddock trees (Case No 00013425) clearing.	<p>In the BDAR two options are presented to address:</p> <p>Option 1: The offset calculations determined that the purchase and retirement of 68 ecosystem credits would be required to meet the offset obligation, as presented in Table 25 (vegetation removal) and Table 26 (paddock tree removal) of the BDAR.</p> <p>Option 2: Offset obligations can also be met by purchase and retirement of the credits listed in direct payment of \$188,143.67 into the Biodiversity Conservation Fund.</p>	Nil	Not yet triggered. The Proponent confirmed that the final credit liability has not yet been finalised.	Not triggered.
Damage to ecological community centrally located on the site from grazing of animals	A livestock fence will be provided around the perimeter of the central EEC to prevent any damage of this area by animals grazing on the site.	Site observations – 20 – 22 October 2021.	This has been provided. Livestock fence was observed installed around the central EEC at the time of the audit site inspection.	Consistent with EIS.
Construction Impacts - Erosion control	<p>Installation of erosion and sediment control measures prior to any works;</p> <p>Regular inspection of erosion and sediment control measures, particularly following rainfall events, to ensure their ongoing functionality; and</p> <p>The immediate removal offsite of excavated materials.</p> <p>Measures that should be adopted during stockpiling of materials should include:</p> <ul style="list-style-type: none"> Avoid stockpiling of materials adjacent to native vegetation, but instead use areas that are already cleared/ disturbed. 	<p>Site observations – 20 – 22 October 2021</p> <p>Recent inspections completed include:</p> <ul style="list-style-type: none"> Habitat boxes 07/10 Bee tree inspection 08/10 Blands Lane – Enviro 11/10 following rain. Blands Lane – Fences 11/10 Blands Lane / Bodell Rd Signage 12/10 Piling activity – 13/10 Enviro - Roads 15/10 Enviro – Roads 18/10 Chemical cabinets 18/10 Rig inspection 19/10 	<p>Sediment fencing has been installed in locations nominated by the Erosion and Sediment Control Plan.</p> <p>Current stockpiles are maintained on disturbed land adjacent to the site compound and main access way.</p>	Consistent with EIS.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	<ul style="list-style-type: none"> Undertake maintenance of silt fences and other mitigation measures to isolate runoff. 	Laydown inspection 19/10.		
Construction Impacts – Dust Control	<ul style="list-style-type: none"> Setting maximum speed limits for all traffic within the study area to limit dust generation. Use of a water tanker or similar to spray unpaved access tracks during the construction phase, where required. Application of dust suppressants or covers on soil stockpiles. 	Site inspection observation 20 – 22 October 2021	<p>Sign posted 40 km/h on main site access road Sign posted 60km/h on Blands Lane – This limit was communicated at daily pre-start induction (attended by auditor 21 October 2021).</p> <p>Not required at time of audit due to high moisture content of stockpiled materials.</p>	Consistent with EIS.
Construction Impacts – Chemical Spill Control	<ul style="list-style-type: none"> All chemicals must be kept in clearly marked bunded areas. Regularly inspect vehicles and mechanical plant for leakage of fuel or oil. No re-fuelling of vehicles, washing of vehicles or maintenance of vehicles and plant to be undertaken within 20 m of natural drainage lines 	<p>Site inspection observations.</p> <p>Site compound, including designated self-bunded chemical containers and bunded location for refuelling.</p>	<p>Due to the early phase on construction there were minimal quantities of substances stored on site. Spill kits were observed on site. Substances are stored in the designated site laydown areas withing self-bunded chemical containers.</p> <p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit.</p>	Consistent with EIS.
Pre-clearance surveys	<ul style="list-style-type: none"> Pre-clearing surveys are to be undertaken by a Proposal Ecologist prior to commencement of any vegetation clearing activities within the Proposal Site. The Proposal Ecologist will conduct pre-clearing surveys to identify: <ul style="list-style-type: none"> Fauna species likely to be encountered during construction and potential impacts to fauna during vegetation clearing; Potential fauna habitat in the Proposal Site; and Preferred locations to relocate fauna species and habitat features that can be retained following construction. Pre-clearing surveys will take place 1-2 weeks prior to the commencement of vegetation clearing. The Proposal Ecologist will mark all 	<p>Site observation 20 October 2021.</p> <p>Habitat Tree Removal, Habitat Box Procedure and Management of displaced fauna</p> <p>Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.</p>	A report from OzArk Environment and Heritage dated 09 September 2021 provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist. This is generally considered consistent with the proposed mitigation measures.	Consistent with EIS.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	potential fauna habitat (e.g. habitat trees, nest trees, burrows, etc.) in the development footprint with high visibility tape (e.g. trees, large woody debris and nests).			
Vegetation Clearing Protocols	<ul style="list-style-type: none"> • A Proposal Ecologist is to be present on site during all vegetation clearing operations. • Areas of vegetation outside the development footprint are to be clearly demarcated with high visibility tape to prevent accidental clearing during the construction phase. • Vegetation should be cleared in a way that will allow fauna species living in or near the clearing site enough time to move out of the area without additional human intervention. • No clearing should occur during the early evening or at night, as this is when fauna species are most likely to be on the move and are more vulnerable to injury. • Habitat links must be maintained during clearing to allow fauna species to move safely from the site to adjacent areas. • Clearing should begin in the area that is furthest from vegetation to be retained. • The direction of clearing should also ensure that fauna species are directed away from threats such as roads, developed areas or disturbed areas (e.g. residential areas or cleared spaces > 100m). • Sequential clearing should not create an 'island' of habitat that is isolated from adjoining habitat by roads or cleared and disturbed areas. 	<p>Bee Tree Incident – Refert to MCoc Schedule 3, Conditions 19 and 20.</p> <p>Incident report contributing causes.</p> <p>PCL – ecologist on site to identify habit trees.</p> <p>Ecologist left site and clearing of non-habitat trees continued.</p>	<p>Self-reported non-compliance with MCoc Schedule 3, Conditions 19 and 20.</p>	<p>Inconsistent with EIS</p> <p>Self-reported non-compliance (NC SR 1)</p>
Habitat Tree Removal Protocols	<ul style="list-style-type: none"> • All habitat trees to be cleared are to be surveyed and marked with high visibility tape prior to clearing. • Clearing should be undertaken in the spring period to facilitate survival of displaced animals. 	<p>Site observation 20 October 2021.</p> <p>Habitat Tree Removal, Habitat Box Procedure and Management of displaced fauna</p>	<p>A report from OzArk Environment and Heritage dated 09 September 2021 provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist. This is generally considered consistent with the proposed mitigation measures.</p>	<p>Consistent with EIS.</p>

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	<ul style="list-style-type: none"> Habitat trees are to be mechanically shaken or agitated prior to felling to encourage any remaining animals to either leave the tree or show themselves and subsequently be removed by the Proposal Ecologist prior to felling. Felling will involve gently pushing the tree and lowering or felling using a forestry harvester to avoid sudden falling as this is likely to injure wildlife. Following felling, habitat trees will be systematically checked from the ground by the Proposal Ecologist for any remaining fauna. Felled habitat trees will be left overnight (i.e. in an adjacent habitat area if required) to allow any undetected fauna further opportunity to escape. If any hollow-bearing tree is found or suspected to contain any threatened species, the tree should be left in place for a minimum of two days and, if possible, be reinspected no more than two hours prior to felling. 	Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.		
Management of Displaced Fauna	<ul style="list-style-type: none"> All handling of fauna species should be conducted by the Proposal Ecologist. In the event that arboreal animals do not move or they cannot be captured because the tree hollow to be removed is too large, too high or its recovery would breach OH&S requirements then the tree will be felled (i.e. in the direction of other tree debris if possible) and animals recovered and relocated to suitable adjacent habitat. Animals are to be removed and relocated to the adjacent bushland/nest boxes within the Western Offset Area prior to felling or the tree shall be sectioned and dismantled under the 	<p>Site observation 20 October 2021.</p> <p>Habitat Tree Removal, Habitat Box Procedure and Management of displaced fauna</p> <p>Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.</p>	A report from OzArk Environment and Heritage dated 09 September 2021 provides a summary for the fauna relocations completed during the clearance of habitat trees at the WWSF by the supervising Ecologist. This is generally considered consistent with the proposed EIS mitigation measures.	Consistent with EIS.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	<p>supervision of the Proposal Ecologist before relocating the animals.</p> <ul style="list-style-type: none"> Nocturnal fauna species, such as microbats, are to be 'soft released' using bat boxes placed in adjacent habitat. Nocturnal fauna species, such as gliders and possums, are to be secured in suitable enclosures and kept in a quiet, dark and cool environment until they can be released into suitable habitat after dark. If any injured fauna species are found during the construction period, construction must stop immediately so that the injured animal can be taken to a vet or wildlife carer. 			
Weed Management	<ul style="list-style-type: none"> Induction materials containing detailed information pertaining to the identification of high threat weeds should be prepared by a suitably trained ecologist or bush regenerator. These materials should be provided to contractors who will carry out construction works within the Proposal Site. All vehicles, equipment, footwear and clothing should be clean and free of weed propagules prior to entering the Proposal Site. Any weeds that are removed during the construction phase should be disposed of via an appropriate waste solar farm. 	<p>Site induction Plant on-boarding process, including evidence of weed and seed declarations.</p>	<p>Processes are implemented on site for the ongoing management of weeds. Plant and equipment are inspected to be free of weed propagules prior to commencement.</p>	Consistent with EIS.
Fauna Monitoring	<p>To reduce the potential for impacts to mobile fauna species such as the Inland Forest Bat (<i>Vespadelus baverstocki</i>) it is recommended that the security perimeter fence is inspected annually as part of a fauna monitoring proposal. The entirety of the security perimeter fence should be inspected by a suitably trained fauna ecologist each year to look for signs of adverse impacts such as animal injury or mortality. Monitoring should be conducted for one to three-years period following proposal construction. A</p>	<p>Site inspection observations.</p>	<p>The security perimeter fence has not been constructed.</p>	Not triggered.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	brief report should be prepared for the applicant following each survey.			
Fencing Retained Vegetation	To reduce the potential for adverse grazing impacts to threatened ecological communities (TECs) to be retained within the Proposal Site, it is recommended that livestock should be excluded from these areas. Suitable fences should be erected to prevent livestock from grazing areas containing TECs.	Site observations – 20 – 22 October 2021.	This has been provided. Livestock fence was observed installed around the central EEC at the time of the audit site inspection.	Consistent with EIS.
Nest-box Installation	To reduce the potential for impacts to arboreal fauna species including the Inland Forest Bat (<i>Vespadelus baverstocki</i>), it is recommended that the removal of habitat trees is offset by the installation of nest- boxes in the road corridors adjacent to the Proposal Site. Nest-boxes suitable for a range of fauna species should be installed at a 1:1 ratio if possible (available area). It is important that the density of nest-boxes is no greater than the natural density of hollows in better quality habitats. The success of the nest-box should be monitored for one to three years following completion of the construction phase. Any damaged nest-boxes should be replaced during this time. A brief report should be prepared for the proponent following each survey.	Site observation 20 October 2021. Habitat Tree Removal, Habitat Box Procedure and Management of displaced fauna Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.	A report from OzArk Environment and Heritage dated 09 September 2021 provides a summary of nest box installation on the project. Next boxes were observed installed in the areas nominated within this report.	Consistent with EIS.
	Aboriginal heritage			
WWSF IF01 (AHIMS ID 43-4-0056) WWSF IF02 (AHIMS ID 43-4-0071)	<ul style="list-style-type: none"> Surface collection of all known stone artefacts that will be impacted by the proposal prior to construction Cultural heritage awareness training to highlight Aboriginal significance of area and process for unexpected finds. Detailed analysis and recording of all collected stone artefacts and collation of data in a salvage report Retention of artefacts by West Wyalong LALC under a Care Agreement. 	WWSF IF01 (AHIMS Number 43-4-0056) Isolated Artefact: <ul style="list-style-type: none"> Memo Report RE: Salvage of Aboriginal Objects, prepared by Artefact, 04 March 2021. This memo provides documentation regarding the salvage of Aboriginal artefacts within WWSF AS01. Correspondence from Heritage NSW to West Wyalong Local Aboriginal Land Council RE: West Wyalong Solar Farm Aboriginal 	An Aboriginal Objects Care Agreement 4658 was obtained 20 October 2020 and Aboriginal artefacts IF01 and IF02 were successfully salvaged in accordance with the requirements of this condition. As per Artefact Heritage's Memo Report RE: Salvage of Aboriginal Objects, the salvage of Aboriginal objects was carried out on one day (23 February 2021) with participants from West Wyalong LALC, Young LALC, Didge Ngunnawal Clan and Artefact Heritage. Limitations	Consistent with EIS.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
		<p>Objects Care Agreement 4658, dated 19 October 2020.</p> <p>WWSF IF02 AHIMS Number 43-4-0071) Isolated Artefact:</p> <ul style="list-style-type: none"> • Memo Report RE: Salvage of Aboriginal Objects, prepared by Artefact, 04 March 2021. This memo provides documentation regarding the salvage of Aboriginal Artefacts. • Correspondence from Heritage NSW to West Wyalong Local Aboriginal Land Council RE: West Wyalong Solar Farm Aboriginal Objects Care Agreement 4658, dated 19 October 2020. 	to the effectiveness of the salvage are expressed within the Memo Report. A total of 13 lithic Aboriginal Objects were retrieved.	
WWSF AS01 (AHIMS ID 43-4-0057)	<ul style="list-style-type: none"> • Surface collection of all known stone artefacts that will be impacted by the proposal prior to construction. • NO GO zones for the lifetime of the solar farm for known stone artefacts that will not be impacted by the proposal NO GO zones to be identified on all construction plans and plans to be kept on site at all times for reference. • Cultural heritage awareness training to highlight Aboriginal significance of area, identification of NO GO zones and processes for unexpected finds. Detailed analysis and recording of all collected stone artefacts and collation of data in a salvage report. • Retention of artefacts by West Wyalong LALC under a Care Agreement. 	Non compliance – due to reported incident.	Refer to MCoC Schedule 3, Condition 19 and 20.	<p>Inconsistent with EIS</p> <p>Self-reported non-compliance</p> <p>(NC SR 1)</p>
WWSF Bee Tree (AHIMS ID 43-4-0058)	<ul style="list-style-type: none"> • NO GO zone for the lifetime of the proposed solar farm to be constructed around the tree in consultation with an arborist. • Reassessment of the protection zone surrounding the tree at the conclusion of the operation of the proposed solar farm. 	Non compliance – due to reported incident.	Refer to MCoC Schedule 3, Condition 19 and 20.	<p>Inconsistent with EIS</p> <p>Self-reported non-compliance</p>

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	<ul style="list-style-type: none"> Tree health to be maintained during construction and operation of the proposed solar farm. Cultural heritage awareness training to highlight the Aboriginal significance of area, identification of NO GO zones and processes for unexpected finds. 			(NC SR 1)
	Land			
Loss of agricultural land	The subject site despite being proposed as a solar farm will continue to be used for agriculture through the grazing of livestock.	Nil	Land is currently a construction site and not being used for livestock. LSbp Senior Environmental Planner confirmed sheep are being investigated to graze on the property during solar farm operations.	Consistent with EIS.
Conflicts with other major proposals within the local context	<ul style="list-style-type: none"> Specific construction traffic routes. Staged construction phases. Exploration of private rental accommodation. Seeking short-term accommodation in surrounding townships. Local procurement of construction workforce. Local procurement of operational team workforce. 	Complaints register. Traffic Management Plan Accommodation and Employment Strategy	Local contractors have been engaged to undertake road upgrade works and cleaning services on the project. Local hotel accommodation is being utilised by the project team, including the auditor.	Consistent with EIS
Connection of electricity powerline	The provision of the connection will require the approval for clearing of vegetation.	Discussion with PCL Construction Manager.	The Construction Manager confirmed clearing of vegetation will be required and that this is being minimised through detailed design.	Consistent with EIS
Concerns by NSW Free Flight Society	A 100-metre-wide flight clearance buffer zone has been proposed on the south western property boundary as shown the Landscape Strategy prepared by Site Image.	Approved layout plan.	Current developments on site are within the approved layout plan.	Consistent with EIS
	Geotechnical			
Natural clays	Any changes to the existing surface profile will require reassessment based on the cut and fill profiles. It is recommended that any foundation	Discussion with PCL Construction Manager.	The Construction Manager confirmed geotechnical requirements are being considered in the design of the solar farm.	Consistent with EIS

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
Site Trafficability	<p>systems be designed to accommodate any anticipated ground surface movements.</p> <p>It is recommended that vegetation be trimmed (mowed) and shrubs be cut to the ground level, which will preserve the crust and improve trafficability. Whereas clearing and grubbing would present issues if the crust is breached, and this would be more pronounced after rainfall events.</p> <p>It is recommended that the following steps be taken to improve trafficability:</p> <ul style="list-style-type: none"> • The exposed surface in the construction area is proof rolled to provide a seal and assist in identifying weak or soft areas for treatment. • Dedicated construction tracks are used to control site traffic and limit trafficability issues. <p>Provision and maintenance of adequate drainage conditions at this site is essential. It should be ensured that runoff is diverted away from the construction and access tracks to prevent ponding of water.</p> <p>To assist in maintaining a workable construction site, the placement of a working platform as a final layer across structure/building platforms is recommended.</p> <p>The contractor performing the works should fully inform themselves of the ground conditions at the site prior to commencement of earthworks. This requirement should be explicit in any earthworks specifications or contract.</p>	<p>Site inspection observations.</p> <p>Discussion with PCL Construction Manager.</p>	<p>Paddocks have been trimmed to preserve the crust and improve trafficability.</p> <p>Proof rolling is being undertaken and has been witnessed by Bland Shire Council.</p> <p>Dedicated construction tracks are being cut in and constructed at the time of this audit.</p>	Consistent with EIS

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
Material Suitability for Reuse	Clays are considered unsuitable for use as structural fill (i.e. behind retaining walls and beneath structures). All site won material will require laboratory testing to confirm contamination status for reusability. Site won material may be used as general filling for access track construction subject to adequate compaction and selective rejection of any unsuitably over-wet material.	Discussion with PCL Construction Manager.	Site won material has been stockpile and not reused at this time.	Not triggered.
Groundwater Control	If groundwater is encountered onsite it is anticipated that any flow emanating from these materials can be managed using sump pumping. This will require further assessment at the time of construction.	Discussion with PCL Construction Manager.	Ground water is being managed through sump pumps, with water relocated to adjacent vegetated (grassed) areas.	Consistent with EIS
Erosion and Drainage	To protect against erosion and dispersion exposed soils should be vegetated or covered. Proper site drainage will be required to divert surface water from sensitive areas in a controlled manner and prevent pooling water. It is recommended that where site construction drainage involves high concentration of flows, the drains be appropriately lined with geotextile or plastic to control erosion on the site. Adequate site drainage will be required to remove runoff from site in a controlled manner and prevent pooling water. It is important that the site is well drained. The ground around all structures should slope away at a gradient of 1:50 for a minimum of 3 m, then fall into a stormwater collection system or overland flow paths to prevent water from ponding adjacent to structures.	Erosion and Sediment Control Plan.	The site is extremely flat and no high concentration flows were evident. Sediment and erosion controls were established on site as per the Erosion and Sediment Control Plan.	Consistent with EIS.
	Visual			

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
Retention of existing trees	Retention of existing groups of trees that centrally traverses the northern and eastern boundary of the Site and within the western half of the Site.	<p>Site observation 20 October 2021.</p> <p>Biodiversity Management Plan</p> <p>Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.</p>	A report from OzArk Environment and Heritage dated 09 September 2021 provides a summary of trees cleared on site. The Biodiversity Management Plan clearly defines tree to be retained.	Consistent with EIS.
Visual buffer	<p>Infill planting to be installed maintaining a 3-metre- wide boundary screening along the remaining site edges, except along the flight society flight clearance buffer. Infill planting to match surrounding retained vegetation.</p> <p>Proposed planting species will be largely comprised of dominant species already found on site, and supplementary planting from a selection of endemic species. As per PBP and Standards for Asset Protection Zones, Trees must have clear trunk to height of 2 metres, and tall - medium shrubs be maintained to be clear of the tree canopy to ensure vertical stratification. Landscape to be planted in clumps and not provide continuous vegetation or canopy.</p>	<p>Site inspection Observations 20 – 22 October 2021</p> <p>Discussion with PCL Construction Manager.</p>	Infill planting has not yet commence, however the Construction Manager confirmed this requirement is being planned for.	Not triggered.
Night lighting	<ul style="list-style-type: none"> All external lighting associated with the Proposal would comply with Australian Standard AS 4282: 1997 – Control of the Obtrusive Effects of Outdoor Lighting. Restriction of night-lighting to the minimum required for operations and safety requirements. Use of directional lighting techniques. Use of light shrouds and reflectors to limit the spill of lighting. 	<p>Site inspection Observations 20 – 22 October 2021</p> <p>Discussion with PCL Construction Manager.</p>	There is currently no lighting on the project. This mitigation measure is considered to be directed towards operations rather than construction.	Not triggered.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
Retention of existing vegetation	<ul style="list-style-type: none"> Retention of existing groups of trees that centrally traverses the northern half of the site. Retention of existing central vegetation within the western half of the site. 	<p>Site observation 20 October 2021.</p> <p>Biodiversity Management Plan</p> <p>Correspondence from OzArk Environment and Heritage dated 09 September 2021, RE: Supervision of habitat clearing for West Wyalong Solar Farm. This provides a summary for the clearance of habitat trees at the WWSF by the supervising Ecologist.</p>	A report from OzArk Environment and Heritage dated 09 September 2021 provides a summary of trees cleared on site. The Biodiversity Management Plan clearly defines tree to be retained.	Consistent with EIS.
Fire buffer zone	<ul style="list-style-type: none"> A minimum 15 metre perimeter fire buffer zone around the entire Site clear of any vegetation. Outside of this fire buffer zone is to be landscaped with buffer planting, coordinating with the requirements of the ecologist report and the visual impact assessment. 	Approved layout plan.	Current developments on site are within the approved layout plan and this includes an asset protection zone / fire buffer.	Consistent with EIS.
Internal vehicle access and perimeter of site	<ul style="list-style-type: none"> Provision for vehicle access around the perimeter of the Site and key locations internally. 	Approved layout plan.	Site access roads are currently being constructed as per the approved layout plan.	Consistent with EIS.
NOISE				
Construction work noise	<ul style="list-style-type: none"> Restriction of hours of work to the ICGBN standard construction hours: <ul style="list-style-type: none"> Monday to Friday: 7.00am to 6.00pm; and Saturday: 8.00am to 1.00pm. 	<p>West Wyalong Solar Farm Noise Impact Assessment, Rev 1 dated 30 November 2018 prepared by SLR Consulting Australia Pty Ltd</p> <p>Complaints Register - No noise complaints.</p> <p>Site HSE Plan, Section 11.2.2 Hearing Protection.</p> <p>Observations during site inspection, including:</p> <ul style="list-style-type: none"> Works within approved hours. Works within approved site boundary. Plant and equipment turned off when not in use. 	On the basis that no complaints have been reported or received, the project is generally considered compliant with the requirements of this condition.	Consistent with EIS.
Construction – All works	Adoption of Universal Work Practices including:	Daily Pre-start Notification Reports.	On the basis that no complaints have been reported or received, the project is generally	Consistent with EIS.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	<ul style="list-style-type: none"> Regular reinforcement (such as at toolbox talks) of the need to minimise noise; Regular identification of noisy activities and adoption of improvement techniques; Avoiding the use of portable radios, public address systems or other methods of site communication that may unnecessarily impact upon nearby residents; Where possible, avoiding the use of equipment that generates impulsive noise; Minimising the need for vehicle reversing for example (particularly at night), by arranging for one-way site traffic routes; Use of broadband audible alarms on vehicles and elevating work platforms used on site; Minimising the movement of materials and plant and unnecessary metal-on-metal contact; and Minimising truck movements. 		considered complaint with the requirements of this condition.	
Construction Traffic	<ul style="list-style-type: none"> The proposed construction traffic is recommended to travel east along Blands Lane, then south on Bodell Lane before accessing the Newell Highway. 	Induction presentation documentation Traffic management Plan	The approved construction traffic routes for both light and heavy vehicles is adequately identified and communication within the project management plants. No complaints received relating to non-approved routes.	Consistent with EIS.
	Traffic and Access			
Flooding of Blands Lane	Prior to construction commencing, the Proposal Manager will meet with Council's Assets Manager (or like) to inventory the existing local road conditions, and particularly the unsealed sections of Blands Lane and Bodells Lane.	Discussion with PCL Construction Manager. Discussion with Bland Shire Council Engineering Manager Dilapidation report.	A road dilapidation report has been prepared and the Proponent is consulting with Bland Shire Council on the condition of the roads.	Consistent with EIS.
Unsealed roads and damage of roads	In the event damage is noted to sections of road. Lightsource BP is to consult with Council regarding remediation for the sections of the road.	Discussion with PCL Construction Manager.	No reported damages	Not triggered.
	Water			

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
Erosion and Sediment Control	<ul style="list-style-type: none"> A site wide Erosion and Sediment Control Plan (ESCP) will be prepared as part of the Construction Environmental Management Plan (CEMP) for the Proposal. 	Erosion and Sediment Control Plan.	Sediment and erosion controls were established on site as per the Erosion and Sediment Control Plan.	Consistent with EIS.
Storage and use of hydrocarbons and chemicals	<p>The risk of hydrocarbon contamination will be mitigated by:</p> <ul style="list-style-type: none"> Storage of chemicals in accordance with Australian Standards. Storage of hydrocarbon fuels within bunded storage areas. Bunding of substation or other infrastructure that utilises oil. Minimise usage of herbicides, and avoid spraying when rain is predicted. A Spill Response Plan, including emergency response and EPA notification procedures. Requirements for the storage and use of hydrocarbon fuels and other chemicals on site will be documented in both the Construction and Operational Management Plans. 	<p>Site inspection observations.</p> <p>Site compound, including designated self-bunded chemical containers and bunded location for refuelling.</p>	<p>Due to the early phase on construction there were minimal quantities of substances stored on site. Spill kits were observed on site. Substances are stored in the designated site laydown areas withing self-bunded chemical containers.</p> <p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit.</p>	Consistent with EIS.
Flooding	<ul style="list-style-type: none"> This level would require the arrays within the north eastern portion of the Proposal Site to be designed appropriately to withstand the inundation without damage. Appropriate freeboard should be applied to the infrastructure above this level. 	Discussion with PCL Construction Manager.	Flooding impacts have been, and are continuing to inform the design of the solar farm.	Consistent with EIS.
Construction phase water quality	<ul style="list-style-type: none"> Preparation of a Construction Environment Management Plan will include an Erosion and Sediment Control Plan, which will further detail requirements and procedures for erosion and sediment control, water quality monitoring, bunding of hydrocarbon storages, and spill response. 	Erosion and Sediment Control Plan.	<p>Sediment and erosion controls were established on site as per the Erosion and Sediment Control Plan.</p> <p>Given the low lying nature of the site and lack of flow through waterways with defined input and output the requirement for water quality monitoring is considered obsolete.</p>	Consistent with EIS.
Water management	Preparation of OEMP Minimum requirements for inclusion within the OEMP include:	Nil	Mitigation measure relates to Operating conditions.	Not triggered

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
during operations	<ul style="list-style-type: none"> Development of a suitable strategy for monitoring and reporting on water quality; A procedure for erosion and sediment controls for ground disturbance activities; and Requirements for storage and use of hydrocarbons and chemicals, and a spill response plan. 			
Unsealed roads and damage of roads	<ul style="list-style-type: none"> Preparation of OEMP (refer to above for inclusions) 	Nil	Mitigation measure relates to Operating conditions.	Not triggered
Construction Impacts	<p>A construction environment management plan (CEMP) will be prepared during the detailed design phase of the proposal, and will outline the environmental measures, monitoring and reporting required to ensure satisfactory environmental performance. Minimum requirements for inclusion within the CEMP include:</p> <ul style="list-style-type: none"> Water quality monitoring during the construction phase, will be carried out as described below for the OEMP. An Erosion and Sediment Control Plan (ESCP) for construction activities that is consistent with the measures outlined in this EIS. 	Refer to MCoC Schedule 4, Condition 1.	<p>Refer to MCoC Schedule 4, Condition 1.</p> <p>Given the low lying nature of the site and lack of flow through waterways with defined input and output the requirement for water quality monitoring is considered obsolete.</p>	Consistent with EIS.
Operational Impacts	<p>An operational environment management plan (OEMP) will be prepared during the detailed design phase of the proposal, and will outline the environmental measures, monitoring and reporting required to ensure satisfactory environmental performance. Minimum requirements for inclusion within the OEMP include:</p>	Nil	Mitigation measure relates to Operating conditions.	Not triggered

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	<ul style="list-style-type: none"> Development of a suitable strategy for monitoring and reporting on water quality; A procedure for erosion and sediment controls for ground disturbance activities; and Requirements for storage and use of hydrocarbons and chemicals, and a spill response plan. 			
Hazards and Risks				
Bushfire – Asset Protection Zones (APZ)	<p>APZs are provided in Table 3 of the Bushfire and Fire response assessment prepared by SLR Consulting.</p> <p>Native trees and shrubs should be retained as clumps or islands and should maintain a covering of no more than 15 % of the APZ area.</p> <p>The conceptual development design will require vegetation to be along the boundary to allow for construction of the perimeter access road.</p> <p>The conceptual design allows for a 15 m fire break between the solar panels and the site boundary which is inclusive of a six meter, sealed perimeter access road.</p>	Nil	Mitigation measure relates to Operating conditions.	Not triggered
Grassland	<p>The distance from the edge of the solar panels to the south western site boundary is over 100 m, which is enough to implement the recommended 50 m APZ.</p>	Nil	Mitigation measure relates to Operating conditions.	Not triggered
Building Construction and Design	<p>BAL-12.5 construction and design standards in accordance with Australian Standard AS 3959 are recommended for the outer facades of buildings proposed to be constructed as part of the solar farm development. Relevant design standards for BAL- 12.5 include:</p> <ul style="list-style-type: none"> Metal framing and cladding materials. Automatic sprinkler systems. Hose reels and hydrants installed at selected locations around the buildings 	Approved layout plans and a sample of For Construction drawings.	The approved layout plan and design drawings sighted appear generally consistent with this mitigation measure.	Consistent with EIS.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	(on the alignment of the perimeter fire trail where possible).			
Responder Access – Perimeter Road Access requirements	<ul style="list-style-type: none"> Provide firefighters with easier access to structures (assets). Provide a safe retreat (egress) for firefighters. Create a clear ‘control line’ from which to conduct hazard reduction or back burning. Carriageway with a minimum width of six metres. Allow for parking outside of carriageway width. Curves of the roads have a minimum inner radius of 6 m. Maximum grade of the road is 15° and the average is 10°. Road crossfall does not exceed 3°; and Vertical clearance of 4 m above the road surface (for overhanging branches, etc.). 	Approved layout plans and a sample of For Construction drawings.	The approved layout plan and design drawings sighted appear generally consistent with this mitigation measure.	Consistent with EIS.
Internal access roads	<ul style="list-style-type: none"> Road width be a minimum of 5.5 m with parking provided outside of the carriageway. The conceptual design for the West Wyalong Solar Farm includes an 8m wide access road and 6m wide internal roads, with a two-lane perimeter road included along the north eastern site boundary. 	Approved layout plans and a sample of For Construction drawings.	The approved layout plan and design drawings sighted appear generally consistent with this mitigation measure.	Consistent with EIS.
Water Supply for Firefighting	The site is not connected to a reticulated water supply as such a dedicated static water supply is required to support the proposal. Two above ground water tanks are provided in the north east of the conceptual layout, providing combined	Site inspection observations 20 – 22 October 2021 Discussion with PCL Safety Advisor.	PCL Safety Advisor confirmed two (2) x 25,000L Water Tanks are installed for the construction.	Consistent with EIS.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	capacity of 45,000L.			
Fuel Load Management	Fuel load management measures include: <ul style="list-style-type: none"> • Strategic grazing of sheep within the Proposal Site during operation to maintain the length of grass under the solar panels. • Raking or removal of fine fuels like leaves, twigs and bark on a regular basis. • Mowing or slashing of grass within APZs and fire breaks, only as required. • Pruning of existing trees and shrubs so as to not have a continuous tree canopy leading from the hazard to the asset. 	Nil	Mitigation measure relates to Operating conditions.	Not triggered
Landscaping	When maintain vegetation in an APZ the following is recommended: <ul style="list-style-type: none"> • Vegetation should not provide a continuous path to the asset. • All noxious environmental weeds (particularly priority weeds listed under the NSW Biosecurity Act 2016) should be removed. • Vegetation should be cleared or planted in clumps to avoid continuation. • Prune low branches two meters from the ground to avoid ground fires spreading into the canopy. • Locate plants far enough away from the asset so that in the event of a fire there is no direct flame contact or radiant heat emission. 	Nil	Mitigation measure relates to Operating conditions.	Not triggered
Empty containers - may explode and cause	<ul style="list-style-type: none"> • Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, or other sources of ignition. 	Site inspection observations 20 – 22 October 2021	No empty containers were observed on site.	Not triggered.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
injury or death	<ul style="list-style-type: none"> "Empty" drums should be completely drained, properly bunged, and promptly shipped to the supplier or a drum reconditioner. All containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations. Before working on or in tanks which contain or have contained this material, refer to OSHA regulations, ANSI Z49.1, and other references pertaining to cleaning, repairing, welding, or other contemplated operations. 			
Storage	<ul style="list-style-type: none"> Keep container(s) tightly closed. Use and store this material in cool, dry, well-ventilated areas away from heat and all sources of ignition. Storage temperatures above 113°F may lead to thermal decomposition, resulting in the generation of hydrogen sulfide and other sulphur containing gases. Store only in approved containers. Keep away from any incompatible material. Protect container(s) against physical damage. 	<p>Site inspection observations.</p> <p>Site compound, including designated self-bunded chemical containers and bunded location for refuelling.</p>	<p>Due to the early phase on construction there were minimal quantities of substances stored on site. Spill kits were observed on site. Substances are stored in the designated site laydown areas withing self-bunded chemical containers.</p> <p>The auditor did not observe any improper handling of dangerous or hazardous materials on site at the time of the audit.</p>	Consistent with EIS
	Waste			
Damaged panels	Damaged panels will be returned to manufacturers for repair and subsequent re-use.	Site inspection observations 20 – 22 October 2021	Panels have not been delivered on site at the time of this audit.	Not triggered.
Solar & Framework Packaging	The packaging surrounding the solar panels and framework will be collected in a designated skip and will be collected once every working day for appropriate recycling. Pallets used for delivering the panels and cable drums will be stored until sufficient numbers make collection by the supplier.	Site inspection observations 20 – 22 October 2021	<p>Skip bins are provided on site.</p> <p>Due to the early phase on construction there were minimal quantities of waste generated and/or stored on site.</p>	Consistent with EIS
Framework cuttings	The excess metal cuttings from both the frame and screw pile foundation will be collected in a	Site inspection observations 20 – 22 October 2021	Piling activities recently commenced on site. No cutting activities appeared to have been undertaken.	Not triggered.

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	designated skip and will be collected once every working day for appropriate recycling.			
Excavated soil	The sites require some ground works for access tracks, cable trenching, cabinet platforms. Excavated soil will be used for backfilling activities.	Site inspection observations 20 – 22 October 2021	Works to date appear generally consistent with this mitigation measure.	Consistent with EIS
Mess room / Dry room	Where relevant, the mess and dry rooms will be fitted out with appropriate recycling bins for the separate sorting and collection of paper, cardboard and aluminium waste.	Site inspection observations 20 – 22 October 2021	Waste and recycling bins are provided on site. Opportunity for Improvement: There is an opportunity to reduce the number of general waste bins and increase the number of recycling bins within the site compound.	Consistent with EIS
Portaloos	During the construction phase of the development the portaloos will be made available at appropriate locations within the application site. The portaloos will be sourced, supplied and managed by a reputable contractor. The principle contractor will ensure that the waste is collected and disposed of by an appropriate licensed waste contractor.	Site inspection observations 20 – 22 October 2021	A limited number of portable toilet facilities have been made available on site.	Consistent with EIS
Cable & Cable trench	Any excess cable will be stored in a designated skip and will be collected by a reputable recycling company for either reuse or recycling. Excess trench material will be suitable segregated on site and collected by a reputable recycling company for re- use or recycling.	Site inspection observations 20 – 22 October 2021	Piling activities recently commenced on site. No cable related works have occurred on site at the time of this audit.	Not triggered
Waste by workers	Personal rubbish will be collected along with non-recyclable packing materials, for disposal at an appropriate landfill.	Site inspection observations 20 – 22 October 2021	Waste and recycling bins are provided on site.	Consistent with EIS
Waste during operations	Very little waste will be generated during operation. The O&M team will be required to remove any waste materials (i.e. for example packaging for any replacement parts, or food waste) when they leave site each day.	Nil	Mitigation measure relates to Operating conditions.	Not triggered.
	Socio-Economic			

Independent Environmental Audit Table

Approval ID	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Environmental Impact Statement Safeguards and mitigation measures				
	No auditable requirements	N/A	-	N/A
End of EIS MM Checklist.				
End of Audit Table.				

Appendix B: Secretary Approval of Audit Team



Ms Diana Mitchell
Principal Environmental Planner
Lightsourcebp
Lightsource Development Services Australia Pty Ltd
Level 10
420 George Street
Sydney NSW 2000
16/08/2021

Dear Ms Mitchell

**West Wyalong Solar - SSD-9504
Independent Environment Audit Team approval 2021**

I refer to your request (SSD-9504-PA-14) submitted on 9 August 2021 for the Secretary's approval of a suitably qualified person to prepare the Independent Environment Audit's (IEA) for the West Wyalong Solar Farm (the project) as required under Schedule 4 condition 6 of SDD-9504 (the Consent).

The Department has reviewed the nomination and information you have provided and is satisfied that Mr Peter Marshman of J2M Systems is suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of Mr Marshman to prepare the IEA's. This approval is conditional on Mr Marshman being independent of the project.

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

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

Within 3 months of completing the IEA's, or otherwise as agreed by the Secretary, in accordance with Schedule 4 condition 6, Lightsource Development Services Australia Pty Ltd is to submit a copy of the IEA report to the Secretary together with its response to any recommendations contained in the IEA report and a timetable to implement the recommendations. Prior to submitting the IEA report to the Secretary, it is recommended that Lightsource Development Services Australia Pty Ltd review the report to ensure it complies with the relevant consent condition.

Please ensure this correspondence is appended to the IEA Report.

If you wish to discuss the matter further, please contact me on 0429400261 or at katrina.oreilly@planning.nsw.gov.au

Yours sincerely

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

Appendix C: Consultation

From: Katrina O'Reilly Katrina.OReilly@planning.nsw.gov.au 
Subject: RE: West Wyalong - IEA - SSD9504 - Scope consultation.
Date: 9 September 2021 at 4:17 pm
To: Peter Marshman peter@j2m.com.au, Michael Wood Michael.Wood@environment.nsw.gov.au

KO

Good afternoon Peter,

The audit should apply the revised 2020 IAPARs. The agencies to be consulted, in addition to us, include the ones you have listed below being:

- Bland Shire Council
- TfNSW
- DPIE Biodiversity and Conservation Division (BCD)
- Heritage NSW
- RAP - West Wyalong Local Aboriginal Land Council
- RAP – Sound Local Aboriginal Land Council.

Regards

Katrina

**Katrina
O'Reilly**

Team Leader Compliance

Energy, Industry & Compliance | Planning and Assessment
T 02 6229 7909 | M 0429 400261 | E katrina.oreilly@planning.nsw.gov.au
PO Box 5475 | Level 1 11 Farrer Place Queanbeyan NSW 2620
www.dpie.nsw.gov.au



**Planning,
Industry &
Environment**

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

From: Peter Marshman [<mailto:peter@j2m.com.au>]
Sent: Thursday, 9 September 2021 2:48 PM
To: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>; Michael Wood <Michael.Wood@environment.nsw.gov.au>
Subject: West Wyalong - IEA - SSD9504 - Scope consultation.

Dear Katrina and Michael,

I received your contact details from Lightsourcebp relation to the West Wyalong Solar Farm Project. With your approval (correspondence dated 16/08/2021), I have been engaged by Lightsourcebp to undertake the initial independent environmental audit (IEA) on the West Wyalong Solar Farm Project in accordance within Schedule 4, Condition 6 the of Project Approval (SSD 9504). The audit period is considered to be works undertaken between the award of Project Approval (28/11/2019) and the completion of the audit site inspection (scheduled for 20 - 22 October 2021).

In accordance with Schedule 4, Condition 6(d) of the SSD 9504 and Section 3.2 of the

in accordance with Schedule 4, Condition 6(a) of the SSD 9504 and Section 3.2 of the Independent Audit Post Approval Requirements (PAR), I'm seeking to consult with you in regard to the final scope of the audit.

Can you please confirm that this audit should apply the 2018 PAR or revised 2020 PAR?

If the 2020 PAR, can you please confirm which, if any, other relevant agencies should also be consulted with regard to the scope and environmental performance of the project.

If the 2018 PAR, then the following agencies/organisations are proposed to be contacted with regard to the audit scope and to seek feedback on environmental performance:

- Bland Shire Council
- TfNSW
- DPIE Biodiversity and Conservation Division (BCD)
- Heritage NSW
- RAP - West Wyalong Local Aboriginal Land Council
- RAP - South Local Aboriginal Land Council.

At this stage the scope is pre-determined by Schedule 4, Condition 6 of the SSD 9504 and Section 3.3 of the Independent Audit Post Approval Requirements (DPE 2018). For your convenience the relevant requirements are reproduced here:

'The audit scope addresses:

- assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent;
- an assessment of compliance with:
 - conditions of consent applicable to the phase of the development that is being audited;
 - all post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
 - all environmental licences and approvals applicable to the development excluding environmental protection licences issued under the POEO Act 1997;
 - an assessment of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;
 - the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
 - a high-level review of the project's environmental management systems (if any), including assessment of any third-party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems. It is not expected that an Independent Audit comprises a

the implementation of the systems. It is not expected that an independent Audit comprises a management system audit, however any key deficiencies identified in the system should be discussed;

- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate*; and
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

Please don't hesitate to contact me if you wish to discuss this matter further.

Kind regards,

Peter Marshman

Director | QSE Consultant

M: +61 422 925 598 E: peter@j2m.com.au

J2M Systems Pty Ltd

www.j2m.com.au

P.O. Box 163, Newport Beach NSW 2106

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From: ROG South West Region Mailbox rog.southwest@environment.nsw.gov.au 
Subject: BCD Response RE: West Wyalong Solar Farm - Independent Environmental Audit
Date: 30 September 2021 at 5:14 pm
To: Peter Marshman peter@j2m.com.au
Cc: Michael Todd Michael.Todd@environment.nsw.gov.au



Hi Peter,

Please find attached our comments on matters to be considered in the audit for West Wyalong Solar Farm.

Let Mick Todd (03 5021 8915) know if you have any questions.

Regards

Andrew Fisher
Senior Team Leader, Planning – South West

Biodiversity and Conservation | Department of Planning, Industry and Environment

T 02 6022 0623 | M 0427 562 844 | E andrew.fisher@environment.nsw.gov.au

PO Box 1040, 512 Dean St, Albury, NSW 2640

www.dpie.nsw.gov.au

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



Planning,
Industry &
Environment

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

From: Peter Marshman <peter@j2m.com.au>
Sent: Friday, 17 September 2021 8:51 AM
To: Andrew Fisher <Andrew.Fisher@environment.nsw.gov.au>
Cc: INFOEnvironment <info@environment.nsw.gov.au>
Subject: West Wyalong Solar Farm - Independent Environmental Audit.

Dear Andrew,

I received your contact details from Lightsourcebp in relation to the West Wyalong Solar Farm Project. I have been engaged by Lightsourcebp to undertake the initial independent environmental audit (IEA) on the West Wyalong Solar Farm Project in accordance with Schedule 4, Condition 6 of the Project Approval (SSD 9504). The audit period is considered to be works undertaken between the award of Project Approval (28/11/2019) and the completion of the audit site inspection (scheduled for 20 - 22 October 2021).

In accordance with Schedule 4, Condition 6(d) of the SSD 9504 and Section 3.2 of the Independent Audit Post Approval Requirements (PAR), I'm seeking to consult with you in regard to the final scope of the audit and/or to provide a comment with regard to the environmental performance of the project. At this stage the scope is pre-determined by Schedule 4, Condition 6 of the SSD 9504 and Section 3.3 of the Independent Audit Post Approval Requirements (DPE 2020). For your convenience the relevant scope and

requirements for the audit are reproduced here:

The audit scope addresses:

- assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent;
- an assessment of compliance with:
 - all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2;
 - all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
 - feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

In order for your comments to be considered within the audit, please provide an email response prior to 04 October 2021.

Please don't hesitate to contact me if you wish to discuss this matter further.

Regards,

Peter Marshman

Director | QSE Consultant

M: +61 422 925 598 E: peter@j2m.com.au

J2M Systems Pty Ltd

www.j2m.com.au

P.O. Box 163, Newport Beach NSW 2106

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Our ref: DOC21/826022

Senders ref:

Mr Peter Marshman
Director
J2M Systems Pty Ltd
P.O. Box 163
NEWPORT BEACH NSW 2106

Via email: peter@j2m.com.au

30 September 2021

Dear Mr Marshman

Subject: West Wyalong Solar Farm Independent Environmental Audit 2021

Thank you for your email dated 17 September 2021 about the West Wyalong Solar Farm Independent Environmental Audit seeking comments from the Biodiversity and Conservation Division (BCD) of the Department of Planning, Industry and Environment.

BCD has statutory responsibilities relating to biodiversity (including threatened species, populations, ecological communities, or their habitats) and flooding. We offer the following feedback about conditions of development approval associated with the Biodiversity Management Plan which was prepared in consultation with BCD.

Actions in the Biodiversity Management Plan

- It is important that the actions listed in Tables 4-1 and 4-2 have been implemented where they have been required.

Vegetation Clearing

- The clearing of native vegetation along Myers Lane must be conducted in accordance with Table 4-1 and the appropriate protocols listed within and at Section 5-Management Protocols.
- The clearing of 32 paddock trees, including 11 habitat trees, must only be conducted in accordance with Table 4-1 and the appropriate protocols listed within and at Section 5-Management Protocols.

SSD 9504 Mod 1

BCD's review of the Modification Application - Schedule 3 Condition 5 Road Upgrades and Site Access (determined on 22 September 2021) indicated that proposed upgrade to the Bodells Lane / Newell Highway intersection may require the clearance of native vegetation along both roads. The audit should consider if this has been adequately assessed and whether appropriate protocols are in place for this work.

If you have any questions about this advice, please contact Michael Todd, Senior Conservation Planning Officer, via rog.southwest@environment.nsw.gov.au or 03 5021 8915.

Yours sincerely



Andrew Fisher
Senior Team Leader Planning
South West Branch
Biodiversity and Conservation Division
Department of Planning, Industry and Environment

From: Norma Freeman younglalc62@gmail.com
Subject: Re: West Wyalong Solar Farm - Independent Environmental Audit
Date: 17 September 2021 at 9:37 am
To: Peter Marshman peter@j2m.com.au



morning Peter

Thanks for your email.

Just wanted you to know that I am a RAP on this project, but I haven't been out on site. I left this for West Wyalong. I don't feel it be appropriate if I comment and not being on the site.

You need to make contact with West Wyalong LALC (Linton Howarth) CEO.

Kind regards

On Fri, Sep 17, 2021 at 8:55 AM Peter Marshman <peter@j2m.com.au> wrote:

Dear Norma,

I received your contact details from Lightsourcebp in relation to the West Wyalong Solar Farm Project. I have been engaged by Lightsourcebp to undertake the initial independent environmental audit (IEA) on the West Wyalong Solar Farm Project in accordance within Schedule 4, Condition 6 the of Project Approval (SSD 9504). The audit period is considered to be works undertaken between the award of Project Approval (28/11/2019) and the completion of the audit site inspection (scheduled for 20 - 22 October 2021).

In accordance with Schedule 4, Condition 6(d) of the SSD 9504 and Section 3.2 of the Independent Audit Post Approval Requirements (PAR), I'm seeking to consult with you in regard to the final scope of the audit and/or to provide a comment with regard to the environmental performance of the project. At this stage the scope is pre-determined by Schedule 4, Condition 6 of the SSD 9504 and Section 3.3 of the Independent Audit Post Approval Requirements (DPE 2020). For your convenience the relevant scope and requirements for the audit are reproduced here:

The audit scope addresses:

- assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent;
- an assessment of compliance with:
 - all conditions of consent applicable to the phase of the development that is being audited. Should there be any uncertainty to which conditions are to be audited, the auditor can seek clarification during the consultation as per Section 3.2;
 - all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
 - feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

In order for your comments to be considered within the audit, please provide an email response prior to 04 October 2021. Please don't hesitate to contact me if you wish to discuss this matter further.

Regards,

Peter Marshman
Director | QSE Consultant
M: +61 422 925 598 E: peter@j2m.com.au

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its subsidiaries.

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Norma Freeman

Chief Executive Officer

Young **Local** Aboriginal **Land** Council

247 Boorowa Street

Young NSW 2594

Ph: 02 63825669

Mob: 0439 649 443

Fax: 02 63822522

I acknowledge the Traditional Custodians of the lands on which I Live, Walk & Work, across Wiradjuri & pay my respects to all Elders Past, Present and Future

Appendix D: Independent Audit Declaration Form

Independent Audit Declaration Form

Project Name	West Wyalong Solar Farm
Consent Number	SSD 9504 Mod 1
Description of Project	Solar Farm (Construction)
Project Address	Blands Lane, West Wyalong
Proponent	Lightsource BP
Title of Audit	Independent Environmental Audit – West Wyalong Solar Farm
Date	30 November 2021

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2018)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- 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;
- 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;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- 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.

Notes:

- Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Audit	Peter Marshman
Signature	
Qualification	Lead EMS Auditor – Exemplar Global No. 114942
Company	J2M Systems
Company Address	P.O. Box 163 Newport Beach NSW 2106

Appendix E: Site Inspection Photographs.

1.1 Site Inspection Observations

A site inspection was carried out as part of this audit and no environmental performance issues were observed. Appendix F presents commentary of photos taken during the audit site.



Photo 1: Establishment of site compound and laydown area.



Photo 2: Laydown areas and piles installed on-site for solar panel infrastructure.



Photo 3: Internal access tracks being constructed. Not yet constructed as all-weather access. Stockpile protected with sediment fencing.



Photo 4: Sediment fencing install on down-slope perimeter, adjacent Gordons Lane.



Photo 5: Stockpiled coarse woody debris for later reuse on site.



Photo 6: Typical internal access road under early phase of construction.



Photo 7: General site conditions including lush groundcover and slashed ground for delivery and installation of piles.



Photo 8: Evidence of some standing water on site following recent rains.



Photo 9: Slashed, but maintained groundcover for delivery of piles.



Photo 10: Piling rig on site.



Photo 11: No-go fencing installed on site in active construction areas



Photo 12: No-go fencing, looking towards and stand of retained, but previously impacted vegetation including the Aboriginal Heritage Bee Tree.



Photo 13: The 'Bee Tree'.



Photo 14: Redundant exclusion zone fencing adjacent the Bee Tree. **Opportunity for improvement:** It is recommended that the previous exclusion fencing be removed as it is currently damaged and in-effective.



Photo 15: Evidence of no-go fencing around internal habitat protection areas



Photo 16: Evidence of existing paddock trees identified for removal.



Photo 17: Internal road pads utilised for laydown of immediate use materials.



Photo 18: General site conditions.



Photo 19: Site access way sealed from Blands Lane.



Photo 20: Sediment fencing at discharge location adjacent site access way and Gordon's Lane.



Photo 21: General waste and recyclable material bins provided in site laydown area.



Photo 22: General site conditions along Blands Lane.



Photo 23: Intersection of Gordons & Blands Lane. Site Access to right of photo.



Photo 24: Evidence of nest boxes installed along Blands Lane.



Photo 25: Wet spot along Blands Lane.



Photo 26: Water cart observed operating along Blands Lane.



Photo 27: Bodells Lane and Newell Highway intersection.



Photo 28: Bodells Lane and Newell Highway intersection.