

Appendix C – Mitigation Measures Table (Bulk Earthworks SSD-97711727)

The following table provides updated recommendations for mitigation measures in response to potential impacts identified in Section 6 of the EIS and responds to the SEARs which require:

“A consolidated summary of all the proposed environmental management and monitoring measures, identifying all the commitments in the EIS.”

Contingency measures for residual environmental risks are embedded within the mitigation framework through trigger-based monitoring, adaptive management responses and escalation procedures, including modification, relocation or temporary suspension of works where required. These measures are implemented through the relevant management plans identified below

Matter / SEAR	Potential Impact	Stage of Project	Mitigation Measure/s
Noise and Vibration	Construction noise impacts at nearby residential and commercial receivers.	Construction	<ul style="list-style-type: none"> Prior to the commencement of construction works, a Construction Noise and Vibration Management Plan (CNVMP) will be prepared and implemented. The CNVMP will identify all potentially impacted receivers, confirm construction activities and staging, assess potential noise and vibration impacts and detail how impacts will be minimised through the implementation of all feasible and reasonable mitigation measures, consistent with the Noise and Vibration Impact Assessment (Prepared by: <i>SLR Consulting Australia Pty Ltd, SLR Project No. 625.010786.00003, dated 11 March 2026, Revision v1.0</i>) and the Transport for NSW Construction Noise and Vibration Guideline. Construction works will be undertaken during standard daytime construction hours only (7:00 am to 6:00 pm Monday to Saturday), with no works on Sundays or public holidays, unless otherwise approved. Works undertaken during the daytime out-of-hours periods on

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			<p>Saturdays (7:00 am to 8:00 am and 1:00 pm to 6:00 pm) will be managed in accordance with the ICNG and the CNVMP, if required.</p> <ul style="list-style-type: none"> ▪ Community notification will be provided at least 7 days prior to the commencement of works, detailing the nature of works, expected duration, hours of work, potential impacts and contact details, where required in accordance with the CNVMP. ▪ All site personnel will undergo site inductions covering noise and vibration controls, permissible hours of work and the location of nearby sensitive receivers. ▪ Behavioural controls will be implemented, including avoiding unnecessary shouting, loud radios and dropping of materials from height. ▪ Plant and equipment will be selected, operated and maintained to minimise noise and vibration emissions, with quieter and less vibration-intensive equipment used where feasible and reasonable. ▪ High noise-generating and vibration-intensive activities will be scheduled to minimise impacts on nearby sensitive receivers, where practicable. ▪ Separation distances between noise- and vibration-generating plant and sensitive receivers will be maximised, and temporary mitigation measures (such as noise barriers, site sheds or earth bunds) may be implemented for stationary plant where feasible and reasonable, consistent with the CNVMP. ▪ Where vibration-intensive works are required within recommended minimum working distances, these activities will be managed in accordance with the CNVMP, including consideration of equipment selection, staging and setback distances. ▪ Vibration monitoring may be undertaken, in accordance with the CNVMP, at the main dwelling or shed structures at 227 Martin Road, Badgerys Creek, when 18-tonne vibratory

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Air Quality	Dust emissions (PM10, PM2.5, TSP) impacting nearby sensitive receptors during bulk earthworks.	Construction	<p>rollers are used during W.05 – Earthworks – Peak and Contamination Screening, where works occur within minimum working distances.</p> <ul style="list-style-type: none"> ▪ Noise monitoring may be undertaken where required, including attended and/or real-time monitoring when noise-intensive works are undertaken near sensitive receivers. Any complaints will be managed in accordance with the procedures outlined in the CNVMP.. <hr/> <ul style="list-style-type: none"> ▪ A Construction Air Quality Management Plan (CAQMP) will be prepared and implemented prior to the commencement of bulk earthworks. The CAQMP will cover all sources of emissions including wind erosion, wheel-generated dust, material handling and processing in general accordance with the Air Quality Impact Assessment (AQIA)(<i>SLR Consulting Australia Pty Ltd, 225-245 Martin Road, Bradfield Bulk Earthworks, Rehabilitation & Quarrying – Air Quality Impact Assessment, 11 March 2026, Revision v1.0</i>). ▪ The CAQMP will include a Trigger Action Response Plan (TARP) supported by real-time PM10 monitoring to manage dust impacts at sensitive receptors, consistent with the framework outlined in Section 6.5.2 of the AQIA. ▪ Real-time PM10 monitoring and dust deposition monitoring will be undertaken during bulk earthworks at locations identified in the CAQMP as being representative of nearby sensitive receptors and prevailing wind directions. Monitoring locations may be reviewed and adjusted during construction where required. ▪ Meteorological monitoring (wind speed and wind direction, as a minimum) will be undertaken during construction to inform implementation of the TARP and site-based dust management responses. ▪ Regular site inspections will be undertaken during construction to identify visible dust emissions, with inspection records maintained in accordance with the CAQMP.

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Traffic and Transport	Safety and amenity impacts from construction vehicle movements.	Construction	<ul style="list-style-type: none"> <li data-bbox="913 485 2000 619">▪ Dust suppression measures will include watering of haul roads and work areas, stabilisation of exposed surfaces, covering or stabilising inactive stockpiles, imposing speed limits on haul roads (where practicable) and minimising drop heights during material handling. <li data-bbox="913 639 2029 699">▪ All loads of loose materials will be covered where required, haul routes maintained, and tracked-out material removed using wet cleaning methods, where required. <li data-bbox="913 719 2029 778">▪ Dust-generating activities may be modified, relocated or temporarily suspended where necessary in response to elevated PM10 trigger levels, in accordance with the TARP. <hr/> <ul style="list-style-type: none"> <li data-bbox="913 815 2074 986">▪ A detailed Construction Traffic Management Plan (CTMP) will be prepared and implemented prior to the commencement of construction works, subject to the conditions of consent, and consistent with the principles established in the Preliminary Construction Traffic Management Plan. The CTMP will form part of the overarching Construction Environmental Management Plan. <li data-bbox="913 1007 2051 1141">▪ Traffic Guidance Schemes will be prepared by an accredited person in accordance with the TfNSW Traffic Control at Worksites Manual and AS 1742.3, and will be submitted to and approved by the relevant road authority (Council and/or TfNSW), where required, prior to implementation. <li data-bbox="913 1161 2029 1295">▪ Construction access will be via Martin Road during the interim period, consistent with existing approved arrangements, utilising the upgraded Martin Road / Elizabeth Drive intersection, with access transitioning to Lawson Road following delivery of the ultimate road network, once precinct road upgrades are completed, where applicable. <li data-bbox="913 1316 2074 1417">▪ Construction traffic will utilise approved Restricted Access Vehicle (RAV) routes and will operate within previously approved construction vehicle movement thresholds of up to 800 vehicle trips per day, unless otherwise approved.

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Surface Water Management	Sediment-laden runoff and impacts to downstream waterways.	Construction	<ul style="list-style-type: none"> ▪ All vehicles transporting loose materials will have loads covered and secured to prevent dust or debris on public roads. ▪ All construction workers and subcontractors will complete a site induction addressing approved access routes, driver behaviour, safety requirements and emergency procedures. ▪ Construction traffic movements and access arrangements will be monitored and reviewed during construction, and the CTMP will be updated where required to manage construction traffic impacts and respond to changing site conditions, in accordance with consent requirements. <hr/> <ul style="list-style-type: none"> ▪ Construction-phase surface water management will be undertaken in accordance with Managing Urban Stormwater – Soils and Construction (the Blue Book) and Environment Protection Licence (EPL) 684. ▪ Clean and dirty water separation will be implemented, with runoff from disturbed areas directed to sediment basins sized to achieve at least 80% hydrological effectiveness and treated to ≤50 mg/L Total Suspended Solids (TSS) and pH 6.5–8.5, consistent with the Surface Water Impact Assessment (SWIA). ▪ Sediment basins will be operated to enable dewatering of the settling zone within five days of runoff-generating rainfall, where practicable, with priority given to reuse of captured water on site, in accordance with the Project Water Management System. ▪ Chemical dosing systems will be implemented where required to enable treated discharges to meet EPL water quality limits, with the specific dosing approach to be confirmed during detailed design.

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			<ul style="list-style-type: none"> ▪ Treated water will be reused on site for dust suppression, fill conditioning and irrigation where practicable, with controlled discharge to Badgerys Creek and, if required and subject to EPL 684 variation, Wianamatta-South Creek, regulated under EPL 684. ▪ Earthworks will be staged to minimise exposed areas, and progressive stabilisation will be undertaken where feasible in accordance with Blue Book timing recommendations and the stabilisation approach described in the EIS. ▪ Surface water quality and quantity monitoring, and stream condition monitoring, will be undertaken where required in accordance with the Surface Water Impact Assessment (<i>Engeny Australia Pty Ltd, SSDA-97711727 Bulk Earthworks, Rehabilitation and Quarrying – Surface Water Impact Assessment, 12 March 2026</i>) and any applicable conditions of EPL 684..
Groundwater	Groundwater level drawdown, changes to recharge and potential impacts to aquifers, groundwater users, groundwater dependent ecosystems and connected watercourses.	Construction	<ul style="list-style-type: none"> ▪ Groundwater will be managed in accordance with the Groundwater Assessment Report (<i>Arcadis Australia Pacific Pty Ltd, SSD-97711727 – Groundwater Assessment Report, dated 11 March 2026</i>), the Water Management Act 2000 and the NSW Aquifer Interference Policy. ▪ Where interaction with groundwater cannot be avoided, including during bulk earthworks, sediment basin construction or temporary drainage works, appropriate management measures will be implemented to ensure compliance with the minimal impact considerations for less productive aquifers as defined under the NSW Aquifer Interference Policy. ▪ Temporary groundwater take will occur within the limits of existing approvals, including Water Access Licence 10WA109463 (authorising up to 25 ML/year). No additional groundwater access approvals are required based on the assessed groundwater interactions.

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			<ul style="list-style-type: none"> Groundwater inflows encountered during construction will be managed to minimise impacts on surrounding land, watercourses, groundwater-dependent ecosystems and registered groundwater users, consistent with the low-permeability characteristics of the Bringelly Shale aquifer and the localised extent of drawdown identified in the Groundwater Assessment Report. Groundwater monitoring and management during construction will be undertaken in accordance with the Bulk Earthworks Water Management Plan, and further consultation with relevant water authorities will be undertaken where required to confirm licensing requirements having regard to final construction methodologies.
Contamination	Risk to human health and the environment from contaminated soils, fill and groundwater.	Construction	<ul style="list-style-type: none"> Contamination will be managed in accordance with the combined Preliminary and Detailed Site Investigation (JBS&G 2026) and the Site Wide Remedial Action Plan prepared by JBS&G Australia Pty Ltd (24 March 2026, Report No. 70609 173,973 Rev 1) (RAP). All identified Areas of Environmental Concern will be remediated and/or managed and validated, as required, to ensure the Site is suitable for the bulk earthworks and the intended commercial/industrial land use. Petroleum hydrocarbon-impacted soils and seepage water within the former brick-making factory footprint will be remediated in accordance with the preferred remedial approach defined in the RAP, including removal of primary contamination sources and on-site treatment and validation of impacted soils and seepage water, where encountered, with off-site disposal retained as a contingency measure only. Asbestos-impacted soils will be managed and remediated in accordance with the RAP, including excavation and removal, on-site treatment of bonded asbestos where suitable, and/or on-site containment of asbestos-impacted soils, within a purpose-designed containment cell with a capacity of up to approx. 100,000 m³, which will operate as a

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			<p>regulated containment facility and be constructed, capped and managed in accordance with the RAP.</p> <ul style="list-style-type: none"> ▪ Construction of an on-site containment cell will occur only where required, based on the outcomes of investigation, remediation and validation works, and will be subject to relevant environmental licensing and long-term management requirements where applicable. ▪ Fill materials, stockpiles, sediments and excavated materials will be assessed and managed in accordance with the revised Fill Management Plan (JBS&G 2026) and relevant inspection and testing requirements prior to reuse or placement on site. ▪ Unexpected contamination encountered during construction will be managed in accordance with the Unexpected Finds Protocol defined in the RAP. ▪ All remediation and validation works will be undertaken in consultation with and subject to review by an EPA-accredited Site Auditor, with validation reporting prepared in accordance with the RAP and, where required, supported by site audit statements and long-term environmental management plans.
Biodiversity	Loss of native vegetation, threatened ecological communities and fauna habitat.	Construction	<ul style="list-style-type: none"> ▪ Vegetation clearing will be limited to the disturbance footprint associated with SSD-97711727 and will be confined to land that is not biodiversity-certified under the former Growth Centres SEPP. ▪ Clearing areas will be clearly delineated prior to commencement of works using temporary fencing and/or signage to prevent inadvertent disturbance outside the clearing footprint. ▪ Pre-clearance surveys will be undertaken by suitably qualified ecologists prior to vegetation removal to identify fauna and habitat features and to implement fauna

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			<p>management measures, in accordance with the Biodiversity Development Assessment Report (SLR Consulting Australia Pty Ltd, 20 March 2026).</p> <ul style="list-style-type: none"> ▪ Vegetation clearing will be staged, where practicable, to allow fauna the opportunity to self-relocate prior to clearing, including implementation of a two-stage clearing process for identified habitat trees, consistent with the BDAR. ▪ Clearing of woodland vegetation will be undertaken outside winter (June–August), where practicable, to minimise impacts to fauna, consistent with the BDAR. ▪ Habitat features such as suitable logs or sections of hollow-bearing trees may be salvaged during clearing, where identified by the supervising ecologist, and relocated within retained vegetation areas of the Site where practicable. ▪ Residual impacts to native vegetation and threatened ecological communities will be addressed through the retirement of ecosystem credits in accordance with the Biodiversity Offsets Scheme, as identified in the BDAR.
Riparian Lands	Direct or indirect impacts on riparian corridors and aquatic habitats.	Construction	<ul style="list-style-type: none"> ▪ Retained sections of Watercourses B and C will be protected from direct disturbance during bulk earthworks. ▪ Erosion, sediment and pollution controls will be implemented to protect retained waterways, consistent with the Sediment and Erosion Control Plan to be prepared for the project and relevant best-practice guidance (including Managing Urban Stormwater – Soils and Construction). ▪ Minor stabilisation works may be undertaken within retained sections of Watercourses B and C where required to maintain bed and bank stability, consistent with best-practice erosion and sediment control measures, noting that detailed riparian rehabilitation and long-term management will be addressed under SSD-97688711.

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			<ul style="list-style-type: none"> ▪ Dewatering and decommissioning of the five farm dams will be undertaken in accordance with the Dam Dewatering Plan (<i>SLR Consulting Australia Pty Ltd, 225–245 Martin Road, Bradfield Bulk Earthworks, Rehabilitation and Quarrying SSD-97711727 – Dam Dewatering Plan, 13 March 2026, Revision v0.1</i>) to minimise impacts on aquatic fauna and downstream waterways, including: <ul style="list-style-type: none"> – progressive lowering of water levels using screened pump intakes under ecological supervision; – capture and relocation of native aquatic fauna (including frogs, turtles, eels and native fish) to identified suitable release locations; – humane euthanasia of introduced fish species in accordance with relevant legislation and permits; and – post-dewatering inspection and ecological sign-off prior to further disturbance of dewatered dam areas.
Aboriginal Cultural Heritage	Harm to Aboriginal objects, sites and areas of cultural significance	Construction	<ul style="list-style-type: none"> ▪ Aboriginal cultural heritage will be managed in accordance with the Aboriginal Cultural Heritage Assessment Report (ACHAR) (<i>Artefact Heritage and Environment Pty Ltd, 225-245 Martin Road, Bradfield Rehab, Quarrying & Bulk Earthworks – SSD 97711727, Final v2, March 2026</i>), prepared in consultation with Registered Aboriginal Parties (RAPs). ▪ Avoidance of Aboriginal sites is the preferred management outcome where feasible. Where avoidance is not feasible, impacts will only occur where authorised by SSD-specific conditions of consent and in accordance with the ACHAR, including the endorsed test and salvage excavation methodologies.

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			<ul style="list-style-type: none"> ▪ Archaeological test excavation will be undertaken within the identified Potential Archaeological Deposit (PAD) adjacent to Badgerys Creek, where proposed works intersect the PAD, in accordance with the test excavation methodology (Appendix B of the ACHAR). ▪ Salvage excavation of AHIMS ID 45-5-5164 and harm to AHIMS ID 45-5-4099 will only occur following the grant of SSD-specific conditions of consent and in accordance with the salvage excavation methodology (Appendix C of the ACHAR) and ongoing consultation with RAPs. ▪ All valid AHIMS sites (AHIMS ID 45-5-4099, AHIMS ID 45-5-2704, AHIMS ID 45-5-5164) and the PAD adjacent to Badgerys Creek will be shown on all relevant project maps and plans until approval to harm is obtained. ▪ A heritage induction will be provided to all contractors prior to commencement of ground-disturbing works. The induction will include an overview of Aboriginal heritage values, relevant legislative obligations, site-specific constraints, and the Unexpected Finds Procedure. ▪ An Unexpected Finds Procedure, including procedures for the discovery of Aboriginal objects and Aboriginal ancestral remains, will be implemented for the duration of construction works in accordance with the ACHAR and relevant legislation.
Non-Aboriginal Cultural Heritage	Disturbance to historical archaeological remains.	Construction	<ul style="list-style-type: none"> ▪ An Unexpected Finds Procedure (UFP) will be developed and implemented for the project. ▪ If unexpected historical archaeological remains are identified during works, works in the immediate area will cease, the area will be appropriately protected, and a suitably qualified archaeologist will be notified to carry out further investigation and assessment. ▪ If the archaeological assessment determines that the remains meet the definition of a 'relic' under the NSW Heritage Act 1977, the Department of Climate Change, Energy, the

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Waste Management	Inappropriate storage, handling or disposal of construction waste.	Construction	<p>Environment and Water will be notified in accordance with Section 146 of the Act, and any further approvals required will be obtained prior to works recommencing.</p> <ul style="list-style-type: none"> ▪ All site personnel involved in the works will receive a heritage induction prior to commencement, including information on the archaeological potential of the site and procedures to follow in the event of an unexpected find. <hr/> <ul style="list-style-type: none"> ▪ A Waste Management Plan (WMP) will be implemented to minimise waste generation and maximise reuse and recycling of materials where practicable, in accordance with the waste management hierarchy and the 225–245 Martin Road, Bradfield – Earthworks and Remediation and Quarrying Waste Management Plan (<i>SLR Consulting Australia Pty Ltd, 11 March 2026, Revision 0.4, Project No. 625.010786.00005</i>). ▪ Waste management will be undertaken in accordance with the waste management hierarchy, prioritising waste avoidance, on-site reuse and recycling, with disposal to landfill or appropriately licensed facilities occurring only where materials cannot be practicably reused or recycled. ▪ Bulk earthworks materials will be reused on site to the extent practicable, consistent with the pcut-and-fill strategy, to minimise the need for off-site disposal and reduce heavy vehicle movements. ▪ Demolition and construction wastes will be separated at source where practicable, stored in appropriately designated areas on site and removed by licensed waste contractors to facilities licensed to receive the relevant waste classifications. ▪ Fill materials, stockpiles and excavated materials will be assessed for suitability for reuse or beneficial use in accordance with the WMP, applicable NSW EPA resource recovery orders and exemptions, and any relevant remediation requirements prior to reuse on site.

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Geotechnical and Rehabilitation	Risk that disturbed land is not rehabilitated to a condition that is safe, stable, non-polluting or suitable for the intended final land use.	Construction and Post-construction	<ul style="list-style-type: none"> ▪ Asbestos-containing material and other hazardous wastes will be handled, stored, transported and disposed of in accordance with SafeWork NSW requirements and NSW EPA guidelines, including disposal to facilities lawfully able to accept the waste. ▪ All loads of waste leaving the site will be covered and secured, and waste transport will be undertaken during approved construction hours only. ▪ Waste tracking records will be maintained, including waste classification, quantities, transport details and disposal or recycling locations, and will be made available to regulatory authorities upon request. ▪ If unexpected waste or contamination is encountered, works in the affected area will cease and the material will be managed in accordance with the Unexpected Findings Protocol set out in the WMP, prior to works recommencing. <ul style="list-style-type: none"> ▪ Rehabilitation of the Site will be undertaken in accordance with the Rehabilitation and Closure Assessment Report (<i>IEMA Ref: GDM01-001, Version No: v0.2, 16 March 2026</i>), the Earthworks Specification and relevant management plans. Rehabilitation will be designed to achieve a final landform that is safe, geotechnically and hydraulically stable, non-polluting and fit for the intended industrial land use. ▪ Quarry pits will be managed and, where required, dewatered and backfilled using approved materials, placed and compacted to criteria suitable for future industrial development, consistent with the final landform design and the revised Fill Management Plan. ▪ Final landform batters, drainage pathways and finished levels will be constructed to achieve long-term geotechnical and hydraulic stability and to minimise erosion and differential settlement, consistent with the approved final landform and earthworks design.

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			<ul style="list-style-type: none"> ▪ Rehabilitation outcomes will be verified through a combination of visual inspections, as-constructed surveys and targeted geotechnical verification where required, undertaken by suitably qualified engineers and specialists. ▪ Rehabilitation completion criteria will be applied to demonstrate that the landform is safe, stable, non-polluting and suitable for the intended future industrial land use, consistent with the Rehabilitation Management Plan, Mining Regulation 2016 requirements and NSW Resources Regulator guidance. ▪ The assessment of rehabilitation outcomes against completion criteria will inform regulatory reporting and closure planning, including any future consideration of Mining Lease surrender, where applicable.