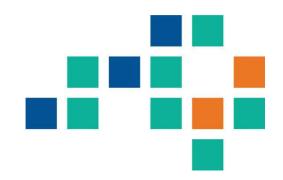
INTERNAL



Construction Environmental Management Plan EnergyConnect (NSW - Western Section) Stage 1

45860-HSE-PL-D-0003

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Revision History					
Rev.	Detailed Description				
Α	Issued for internal review				
В	Issued for Transgrid review				
С	Updated to incorporate aspects from EnergyConnect (NSW – Western Section) Submissions Report				
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E	Updated following receipt of Transgrid's comments				
F	Updated following receipt of Transgrid's comments and draft conditions of Approval				
G	Updated following receipt of Transgrid's comments and to address the Infrastructure Approval				
Н	Updated following receipt of comments from Transgrid				
I	Updated following receipt of comments from the Environmental Representative				

Key Document Stakeholders					
To be communicated with during reviews and revisions of this document					

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Abbreviations

Acronym	Definition	
Amendment Report	EnergyConnect (NSW – Western Section) Amendment Report	
AS/NZ	Australian Standard/New Zealand Standard	
BC Act	Biodiversity Conservation Act 2016	
ccs	Community Communication Strategy	
CEMP	Construction Environmental Management Plan	
CSSI	Critical State significant infrastructure	
DAWE	Department of Agriculture, Water and the Environment	
DPIE or Department	Department of Planning, Industry and Environment	
EECs	Endangered ecological communities	
EIA	Environmental Impact Assessment	
EIS	EnergyConnect (NSW – Western Section) Environmental Impact Statement	
EMS	Environmental Management System	
EP&A Act	Environmental Planning and Assessment Act 1979	
EPA	NSW Environment Protection Authority	
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999	
EPL	Environment Protection Licence	
ER	Environmental Representative	
FMEA	Failure mode and effects analysis	
HAZID	Hazard Identification	
HAZOP	Hazard and operability	
HSSE	Health, Safety, Security and Environment	
HSSE Manual	Health, Safety, Security and Environment Management Manual	
JHA	Job hazard analysis	
LGA	Local Government Area	
MNES	Matters of National Environmental Significance	
NCR	Non-conformance report	
NEM	National Electricity Market	
NP&W Act	National Parks and Wildlife Act 1974	
NSW	New South Wales	
PESCP	Progressive erosion and sediment control plan	
POEO Act	Protection of the Environment Operations Act 1997	
project, the	EnergyConnect (NSW - Western Section)	
Response to DPIE Request for Information	The 'additional information letter dated 10 August 2021' in the definition section of the Infrastructure Approval; document is also titled <i>EnergyConnect (NSW – Western Section)</i> Response to DPIE Request for Information – 7 May 2021 and subsequent discussions	
RMMs	Revised management measures	
ROLs	Road occupancy licences	
SA	South Australia	
SAPs	Sensitive area plans	

Acronym	Definition	
SecureEnergy	Elecnor and Clough Projects Australia Pty Ltd have formed the SecureEnergy Joint Venture (SecureEnergy). SecureEnergy is the contractor who will be carrying out the project on behalf of Transgrid.	
SSI	State significant infrastructure	
Submissions Report	ort EnergyConnect (NSW – Western Section) Submissions Report	
TfNSW	Transport for NSW	
Vic	Victoria	
WM Act	Water Management Act 2000	
WMS	Work method statement	

1 Introduction

1.1 Context

Transgrid and ElectraNet will deliver a high voltage electricity interconnector between the power grids of South Australia (SA) and New South Wales (NSW), with an added connection to Victoria, known collectively as EnergyConnect. EnergyConnect will reduce the cost of providing secure and reliable electricity transmission between NSW, SA and north-west Victoria in the near term and facilitate the transition of the energy sector across the National Electricity Market (NEM) to low emission energy sources.

Transgrid is responsible for the portions of EnergyConnect within NSW, which includes the construction of transmission line from the NSW/SA border to Buronga, expansion of the Buronga substation, construction of transmission line from Buronga substation to the NSW/Victoria connect to the existing Red Cliff substation, and construction of transmission line from Buronga to Wagga Wagga.

Elecnor and Clough Projects Australia Pty Ltd have formed SecureEnergy for the purpose of the design and construction of EnergyConnect.

1.2 Background

On 29 August 2019 the NSW Minister for Planning and Public Spaces declared EnergyConnect a critical State significant infrastructure (CSSI) under the *Environmental Planning and Assessment Act* 1979 (EP&A Act) on the basis that it is critical to the State for environmental, economic or social reasons. Within NSW, EnergyConnect is therefore subject to assessment under Part 5, Division 5.2 of the EP&A Act.

Transgrid have two environmental planning approval applications for the sections within NSW:

- EnergyConnect (NSW Western Section) SA/NSW border to Buronga and Buronga to the NSW/Victorian border; and
- EnergyConnect (NSW Eastern Section) Buronga to Wagga Wagga.

A referral under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was submitted on 27 May 2020. The Australian Department of Agriculture, Water and the Environment (DAWE) determined the project to be a controlled action on 26 June 2020 and thus, it would be assessed using the bilateral assessment process. As such, the project also requires approval from the Australian Minister for the Environment under the EPBC Act.

The EnergyConnect (NSW – Western Section) Environmental Impact Statement (EIS) was prepared for the project in October 2020 and was placed on public exhibition from 30 October 2020 to 10 December 2020. A total of 20 submissions were received, with 15 from government agencies, three from organisations and two from the public.

The EnergyConnect (NSW – Western Section) Submissions Report (Submissions Report) was prepared for the project in response to the submissions received during the public exhibition of the EIS. The Submissions Report was finalised on 14 April 2021.

Transgrid also prepared a separate *EnergyConnect (NSW – Western Section) Amendment Report* (Amendment Report) to document design changes and additional environmental assessment undertaken since exhibition of the EIS. The Amendment Report was also finalised on 14 April 2021.

On 7 May 2021, Department of Planning, Industry and Environment (DPIE) requested additional information (*EnergyConnect (NSW – Western Section*)(*SSI-10040*) Request for Additional Information) to assist with the assessment of the project. In response Transgrid prepared and provided the EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021 and subsequent discussions (Response to DPIE Request for Information) (May 2021). The response provided to DPIE included a Revised Biodiversity Development Assessment Report

(Final BDAR) (August 2021) and the final set of Revised Management Measures (RMMs) that are to be applied. The Response to DPIE Request for Information was dated 10 August 2021.

Approval for the project under the EP&A Act was granted by the NSW Minister for Planning and Public Spaces (Infrastructure Approval SSI 10040). Approval of the project will lapse if the project have not physically commenced the project within five years of the date the approval was granted. Approval for the project under the EPBC Act was granted by the Australian Minister for the Environment.

1.3 Scope

This Construction Environmental Management Plan (CEMP) and the associated Stage 1 sub-plans have been prepared to describe the environmental management practices and procedures to be implemented for the construction of Stage 1 of EnergyConnect (NSW – Western Section) (the project). Section 2.3 outlines the scope of works included in Stage 1 of the project.

All construction personnel and sub-contractors will be required to undertake works in accordance with this CEMP and the management measures identified in any relevant site-specific documents.

1.4 Purpose

This CEMP has been prepared to primarily address the requirements of condition B1 to B6 of the Infrastructure Approval.

The purpose of this CEMP is to provide a structured approach to the management of environmental issues during construction of the project. This plan defines the environmental management principles, processes, procedures, systems, tools, and templates implemented for use throughout the duration of construction of the project with the aim to prevent and, where prevention is not reasonable and feasible, minimise environmental harm during the construction phase.

In particular, this CEMP:

- describes the project and activities to be undertaken;
- describes the environmental management system and documents that will be implemented;
- states the objectives and targets for the project;
- provides management measures to minimise environmental impacts;
- describes the roles and responsibilities of personnel in relation to environmental management;
- · outlines a monitoring regime during construction; and
- supports the project team in completing the requirements of the project.

1.5 Preparation of this plan

In accordance with condition B6 of the Infrastructure Approval, this plan has been prepared by a suitably qualified and experienced person. This plan was prepared by Martin Lee and reviewed by Rebecca Walker-Edwards. This CEMP will be implemented for the duration of construction of Stage 1 of the project.

1.6 **CEMP Consultation**

The Infrastructure Approval requires the CEMP sub-plans to be prepared in consultation with relevant government agencies and stakeholders. The CEMP sub-plans that require consultation with the relevant stakeholders are marked with a letter 'C' as shown in Table 1.1 below.

Table 1.1 - CEMP sub-plans that require consultation

CEMP Sub-plan required under condition B2 of the Infrastructure Approval	Council	DPIE Water	BCS	Heritage NSW	Aboriginal stakeholders	TfNSW
Noise and Vibration	С					
Soil and Water	С	С				
Biodiversity	С		С			
Heritage				С	С	
Traffic and Transport	С					С

In accordance with condition B3, the consultation records of the CEMP sub-plans listed under condition B2 will be provided and submitted to DPIE with the relevant CEMP sub-plan.

In accordance with condition A7, consultation records of other approval documents that require consultation with an identified party will be submitted to DPIE.

1.7 Submission and approval

In accordance with condition B5 of the Infrastructure Approval, the CEMP and CEMP sub-plans listed under condition B2 must be submitted and approved by the Secretary of Department of Planning, Industry and Environment (Planning Secretary) prior to the commencement of construction. The sub-plans may be submitted along with, or subsequent to, the submission of this CEMP.

Construction will not commence until the CEMP and CEMP sub-plans required under condition B2, or where staging is proposed the plans required for that stage, have been approved by the Planning Secretary, and detailed plans of the final layout plans of the project.

Transgrid and/or SecureEnergy will comply with the requirements that arise from DPIE's assessment of submitted plans, reports or audits.

Any document prepared in accordance with the Infrastructure Approval that must be prepared within a specified timeframe may be submitted within a later timeframe agreed with the Planning Secretary.

1.8 Distribution

SecureEnergy's Environmental Manager will coordinate the preparation, review and distribution, as appropriate, of the environmental documents. During construction, environmental documents will be stored electronically at the site office and will be available upon request to SecureEnergy's Environmental Manager.

This CEMP and CEMP sub-plans will be available to all personnel and sub-contractors via hard copy (if requested) or through the project document control system. Documents which are required to be made public will also be placed on the project website which is located at https://www.projectenergyconnect.com.au.

Registered copies will be distributed to the following:

- Project Director;
- Deputy Project Director;
- Construction Manager;
- Project HSSE Manager;
- Environmental Manager;
- Transgrid Document Controller;

- Transgrid's Environmental Manager; and
- Environmental Representative.

1.9 Continuous improvement

The Plan-Do-Check-Act model will be applied to the continuous improvement process.

The Plan stage outlines the environmental objectives and the process to achieve the results. This is outlined through the Environmental Management System (EMS) described in Section 4 of this CEMP and supported by the Environmental Aspect and Impact Register provided within Appendix A3.

The Do stage focuses on the implementation of the EMS. Tools such as Work Packs and Work Method Statements described in Section 4.4 will be prepared to facilitate the implementation of the EMS. The Work Packs and Work Method Statements will be supported by drawings, forms and plans. The roles and responsibilities in carrying out the Do stage is provided in Section 4.9, while Section 6 outlines the various communication methods.

The Check stage comprises ongoing monitoring of the environmental management performance against the environmental objectives, for the purpose of identifying opportunities for improvement. This will be undertaken through regular environmental inspections, monitoring and auditing as described in Section 9.

The Act stage include undertaking the required actions in order to achieve the environmental objectives. Corrective and preventive actions are further described in Section 11. In addition to this, for any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Environmental Manager to coordinate the preparation of the revised documents, as further described in Section 1.7.

1.10 Updating the CEMP

In accordance with condition E1 of the Infrastructure Approval, SecureEnergy will review and, if necessary, revise the applicable strategies, plans or programs required by the Infrastructure Approval to the satisfaction of the Planning Secretary within three months of the following:

- submission of an incident report under condition E6 of the Infrastructure Approval;
- submission of an audit report under condition E11 of the Infrastructure Approval; or
- any modifications to the Infrastructure Approval.

Further to this, a document review process will be implemented to ensure that the environmental management practices and procedures which are to be implemented for construction as required by this CEMP, are updated as appropriate for the specific works that are occurring on-site. The document review process of the CEMP, sub-plans or other approval documents required under the Infrastructure Approval will be undertaken:

- in response to changes in the applicable legislation;
- where requested or required by DPIE (condition A3);
- where deficiencies in the CEMP are identified in inspections, monitoring, or complaints;
- in response to project changes as described in Section 1.11; and
- annually where the above circumstances do not arise.

Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Environmental Manager or their delegate to prepare the revised documents. The revised document will then be issued to the Project Director for internal approval and reviewed by Transgrid prior to re-issue.

Minor changes to the CEMP, sub-plans or other approved documents required under the Infrastructure Approval may be required during delivery of the project. The Environmental

Representative will consider and can approve minor changes to the CEMP, sub-plans or other approved documents. Minor changes involve updating the approved environmental documents that:

- are administrative in nature (e.g. staff and agency/authority name changes);
- do not increase impacts to nearby sensitive receivers;
- are consistent with the terms the Infrastructure Approval and the other documents approved by the Planning Secretary;
- are in response to audit findings relating to procedures and processes of the environmental management system;
- in response to changes in the applicable legislation such that the project complies with the amended legislative requirements; or
- any other changes or updates that considered minor by the Environmental Representative.

SecureEnergy will provide the documentation requested by the ER in order for the ER to perform their function.

Changes to the CEMP, sub-plans or other approved documents required under the Infrastructure Approval that are not defined as minor will be discussed with DPIE to confirm the need for further review and approval. If required, the updated CEMP or sub-plans will be submitted to the ER for endorsement prior to being submitted to DPIE for review and approval.

As permitted by condition E2, with the agreement of the Planning Secretary, staged or updated strategies, plans or programs may be prepared without undertaking all of the consultation required under the applicable condition in the Infrastructure Approval.

1.11 Changes to the project

The project may only be carried out:

- in compliance with the conditions of the Infrastructure Approval;
- in accordance with all written directions of the Planning Secretary;
- · generally in accordance with the EIS; and
- generally in accordance with the Development Layout in Appendix 1 of the Infrastructure Approval.

In the event of an inconsistency, ambiguity or conflict between any of the documents listed in last two dot points above, the Infrastructure Approval and/or directions of the Planning Secretary, or the most recent document between those documents would prevail to the extent of the inconsistency, ambiguity or conflict.

Amendments or changes to the project may result from detailed design refinements or changed methodologies throughout construction.

Design and construction methodology changes will be communicated to SecureEnergy's Environmental Manager. The Environmental Manager will review the proposed change in consultation with the Transgrid Environmental Manager, where required and the Environmental Representative to determine whether it is consistent with the approved project.

Changes that are not consistent with the approved project will be discussed with DPIE to confirm requirements. Transgrid as the Proponent will apply for any required formal modifications to the approved project.

If any changes to the project require changes to the CEMP, the Environmental Manager will identify the required changes and update the CEMP as required by Section 1.10.

2 Project description

2.1 Overview of EnergyConnect

Transgrid and ElectraNet are currently seeking approval for the proposed construction and operation of a new electrical interconnector and network support option between NSW and SA, with an additional connection to Red Cliffs in north-west Victoria. Collectively, the proposed interconnector is known as EnergyConnect.

The interconnector is aimed at reducing the cost of providing secure and reliable electricity transmission between NSW and SA in the near term, while facilitating the transition of the energy sector across the National Electricity Market to low emission energy sources.

The preferred option involves constructing a new high voltage electricity interconnector, approximately 900km long, between the power grids of SA (starting at Robertstown) and NSW (finishing in Wagga Wagga). EnergyConnect comprises several sections (as shown on Figure 2.1), being:

- Victorian section, which extends from the NSW/Victoria border to an existing electricity facility at Red Cliffs;
- NSW sections including:
 - Western section (the subject area of this CEMP) which extends from:
 - the SA/NSW border (near Chowilla in SA) to Buronga;
 - Buronga to the NSW/Victoria border at Monak (near Red Cliffs in Victoria);
 - Eastern section, which extends from Buronga to Wagga Wagga; and
- SA section, which extends from Robertstown to the SA/NSW border.

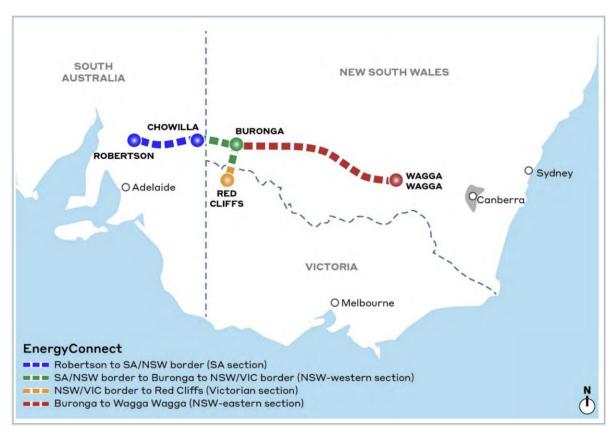


Figure 2.1 - Overview of EnergyConnect (WSP)

2.2 EnergyConnect (NSW – Western Section)

The proposed works for EnergyConnect (NSW - Western Section) will traverse from SA/NSW border (near Chowilla in SA) to Buronga, and Buronga to the NSW/Victoria border at Monak (near Red Cliffs in Victoria), a distance of approximately 160 kilometres (refer to Figure 2.3). The NSW western section is situated within the Wentworth Local Government Area (LGA).

The works for EnergyConnect (NSW - Western Section) will be delivered in two stages. Stage 1 involves works at Buronga Substation. Stage 2 involves all remaining works including but not limited to construction of approximately 135km of new 330kV double circuit transmission line, upgrade of existing 24 km long 220kV single circuit transmission line (Line 1 and Line 4) and the upgrade and expansion of the existing Buronga substation to a combined operating voltage of 220kV/330kV.

2.3 Staging

Condition E2 allows preparation of plans on a staged basis, with the approval of the Planning Secretary. Where a plan is staged, the scope of works can be carried out without addressing particular requirements of conditions of approval that are not applicable to the particular stage. This CEMP and associated CEMP sub-plans are staged in accordance with Condition E2.

Stage 1 of construction is proposed to occur ahead of the main transmission line works in order to expedite the overall delivery program for EnergyConnect. Transgrid/SecureEnergy will notify DPIE in writing via the Major Projects website portal of the date of commencing Stage 1.

The Buronga substation is located on Arumpo Road in Buronga. The existing 220kV substation will be upgraded and expanded to a new 330kV substation on a land parcel adjacent to the existing 220kV substation. Refer to Figure 2.2 for the indicative disturbance area of Stage 1 of construction.

The key project components of Stage 1 of construction include, but are not limited to, the activities provided in Table 2.1.

Table 2.1 - Key project components of Stage 1 of construction

Key activity	Description of key activity		
Environmental investigations, including biodiversity and heritage protection, salvage and recordings.	These key activities nominated in this stage will have already commenced as part of the pre-construction minor works permitted in accordance with the Infrastructure Approval. The definition of 'construction' within the Infrastructure Approval excludes these activities. They will therefore not be subject to the Stage 1 CEMP and CEMP sub-plans.		
Other survey work, such as road dilapidation surveys, and surveys of the general alignment and existing utilities.			
Site establishment at Buronga substation upgrade and expansion site	 The main site establishment activities that would be undertaken at Buronga substation upgrade and expansion site include: clearing of vegetation within the disturbance area (including scrub, undergrowth and ground vegetation); clearing and removal of topsoils. Topsoil would be stockpiled on site for later reuse; establishing crushing and screening plants (if required), ancillary facilities, including but not limited to offices and amenities, and internal roads; and installing temporary fencing (including fencing around the site where required), signage and security measures as well as any necessary construction environmental management measures such as erosion and sediment controls. 		
Bulk earthworks at Buronga substation upgrade and expansion site	Bulk earthworks to form the Buronga substation pad which includes placement of around 350,000m³ of rock/gravel/soil from the earthworks material site to allow for the construction of the substation pad in preparation for concrete foundations. Crushing and screening activities may be required in order to meet the engineering requirements. Existing soil that does not meet engineering requirements for the substation pad will be temporary stockpiled.		

Key activity	Description of key activity				
Site establishment of the Buronga accommodation	The main activities that would be undertaken at Buronga construction compound and accommodation camp includes:				
camp	 clearing of vegetation within the disturbance area (including scrub, undergrowth and ground vegetation); clearing and removal of topsoils. Topsoil would be stockpiled on site for later reuse; establishing the accommodation camp and associated facilities, including but not limited to site offices, amenities, wastewater treatment plant, power generators, 				
	 hazardous material and fuel storage area and internal roads; establishing and operating site offices and other ancillary facilities, including but not limited to and amenities, and internal roads; 				
Site establishment and operation of the Buronga construction compound	 connections and pre-commissioning of on-site utilities (wastewater treatment plant, electrical power, lighting and etc.) for the construction compound and accommodation camps; and 				
	 installing temporary fencing, signage and security measures as well as any necessary construction environmental management measures such as erosion and sediment controls, where required. 				
Access points	The establishment of access points would include:				
	 establishing vehicle access and egress points including adjustment of roads to ensure safe vehicle movements; and establishing truck wheel wash or rumble grids. 				
	The definition of construction within the Infrastructure Approval does not include road upgrades (which includes access points). Road upgrade works are, however, incorporated within the Traffic and Transport Management Plan as required by condition D40 b).				
Water supply points – establishment and/or use	A series of water supply points have been identified as suitable connection points to existing water supply pipelines. The proposed water supply points which are to be established and/or used include:				
	Alcheringa Drive, Buronga; andModica Crescent, Buronga.				
Utility adjustments and protection	General utility protection and adjustment works, where required, to allow for the Buronga substation expansion and upgrades works to occur, the establishment of the accommodation camp and the establishment and operation of the construction compound.				

Some activities nominated in this stage will have already commenced as part of the pre-construction minor works permitted in accordance with the Infrastructure Approval. Following approval of the CEMP for Stage 1, these works will remain excluded from the definition of 'construction' and therefore which are not subject to the CEMP. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval.

This CEMP has been prepared specifically for EnergyConnect (NSW – Western Section) Stage 1 of construction and will be implemented for the duration of Stage 1 of construction.

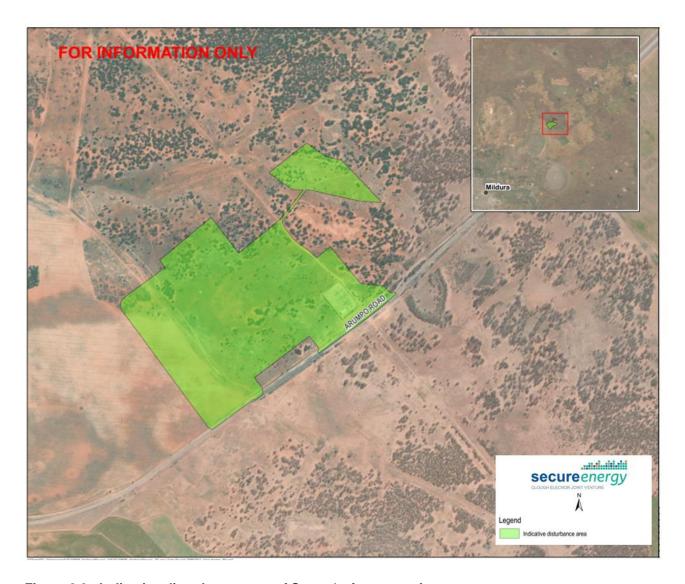


Figure 2.2 - Indicative disturbance area of Stage 1 of construction

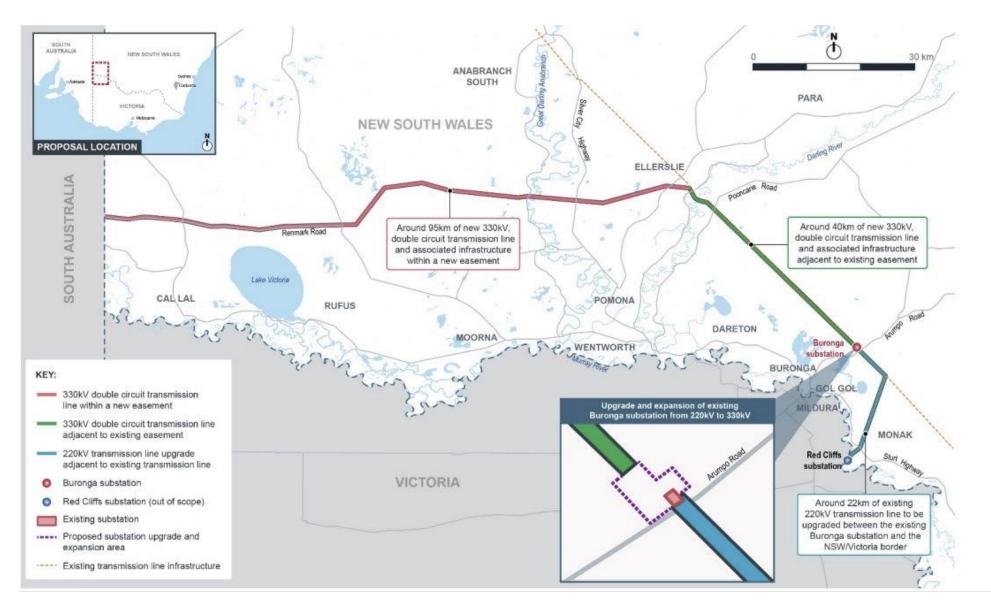


Figure 2.3 - Key features of EnergyConnect (NSW - Western Section) as shown in the EIS

3 Planning

3.1 Legal and other requirements

A summary of legal requirements is provided within Appendix A1. This register will be maintained by SecureEnergy throughout the project and updated as required.

Legal and other requirements are managed in accordance with the *Global Control of Legal and Other Requirement Procedure* which describes the minimum requirements for the identification and management of Health, Safety, Security and Environmental (HSSE) legislation and other requirements applicable to project activities.

Any legislative updates will be notified to relevant SecureEnergy personnel through the use of LawStream. Changes made to the legal requirements register will be communicated to the wider team where necessary through toolbox talks, specific training or other methods detailed in Section 6.

SecureEnergy will obtain licences, permits and approvals as required for the works and maintain them as required throughout delivery of the project, which may include but not be limited to Environment Protection Licence (EPL) for scheduled activities under the *Protection of the Environment Operations Act 1997* (POEO Act) and road occupancy licences (ROLs). Copies of licences, approvals and permits shall be held digitally within the site office with files available for audit and inspection purposes.

Some licences or permits may be held by subcontractors or external parties engaged to SecureEnergy and have not been specifically listed within the summary. Examples include:

- licences for transporting certain waste types;
- an asbestos removal licence (Class A or Class B licence);
- drivers of dangerous goods vehicles to hold a dangerous goods licence; or
- licensed ecologists for threatened species handling.

3.2 Conditions of approval

The conditions of the Infrastructure Approval relevant to the preparation of this CEMP are included within Table 3.1. The conditions of the Infrastructure Approval relevant to each management subplan are dealt with within each of those plans.

There are several conditions of the Infrastructure Approval that are unassigned to a specific environmental management sub-plan or other project management plans. The management measures that will be implemented for the project in relation to these conditions are provided in Appendix A5 of this CEMP. A table detailing where each condition of the Infrastructure Approval is addressed is provided in Appendix A6 of this CEMP.

Table 3.1 - Conditions relevant to this CEMP

Condition number	Requirement	Where addressed
B1	Prior to the commencement of construction, a Construction Environmental Management Plan (CEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures specified in the EIS will be implemented and achieved during construction to the satisfaction of the Planning Secretary.	This plan.

Condition number	Requ	irement	Where addressed	
B2	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1. Table 1: CEMP Sub-plans			Consultation of the CEMP subplans are addressed in Section 1.6.
		Required CEMP Sub-plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub- plan	
	(a)	Noise and Vibration	Council	
	(b)	Soil and Water	DPIE Water Council	
	(c)	Biodiversity	BCS Council	
	(d)	Heritage	Heritage NSW Aboriginal stakeholders	
	(e)	Traffic and Transport	TfNSW Council	
В3	a CEI		quested by an agency to be included in ult of consultation must be provided b-Plan.	Consultation is addressed in Section 1.6.
B4	subse		s may be submitted along with, or sion of the CEMP but in any event prior onstruction.	The timing of submission of the CEMP sub-plans is addressed in Section 1.7.
B5	Sub-p CEMI Secre Wher a stag	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, must be implemented for the duration of construction. Where construction of the development is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been approved by the Planning Secretary.		Section 1.7 of this CEMP addresses the requirements of this condition.
B6	The CEMP and CEMP Sub-plans required under this approval must be prepared by suitably qualified and experienced persons in accordance with relevant guidelines, and include where relevant:		Section 1.5 address the preparation of this CEMP and CEMP sub-plans.	
	a) a summary of relevant background or baseline data;			The relevant background or baseline data is provided within Section 3 of each of the CEMP sub-plans.
	b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);			The relevant statutory requirements are addressed in Section 3 and Appendix A1 of this CEMP, and Section 2 of the CEMP sub-plans.
	(ii) any relevant limits or performance measures and criteria; and		Section 4.2 of this CEMP addresses the performance	
	(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;		measures, criteria and performance indicators.	
	c) any relevant commitments or recommendations identified in the EIS;		The relevant commitments or recommendations identified in the EIS are included within Section 3.3 of this CEMP and Section 2.3 of the relevant CEMP sub-plans.	

Condition number	Requirement	Where addressed
	d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	The environmental measures that will be implemented are addressed within Section 3.3 and Appendix A5 of this CEMP, and Section 5 or 6 of the relevant CEMP sub-plan.
	e) a program to monitor and report on the: (i) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and	Tables summarising the monitoring and reporting requirements are provided in Section 9.2 and 10 of this CEMP.
	(ii) effectiveness of the management measures set out pursuant to paragraph (d);	Environmental inspections will be used to monitor the effectiveness of management measures. This is addressed in Section 9.1.
	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Unpredicted impacts are addressed in Section 12. Unexpected finds procedures are also provided in the relevant CEMP sub-plans to address and manage unpredicted impacts.
	g) a program to investigate and implement ways to improve the environmental performance of the development over time;	Continuous improvement is addressed within Section 1.9 of this CEMP.
	h) a protocol for managing and reporting any: (i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion;	Managing and reporting incidents is addressed in Section 8 of this CEMP. Non-compliances are addressed in Section 10.1 and 11 of this CEMP. Exceedance of any impact assessment criterion is addressed in Section 9.2. Exceedance of any performance criterion is addressed in Section 4.2.
	(ii) complaint; or	Managing and reporting complaints are addressed in Section 7.2 of this CEMP.
	(iii) failure to comply with other statutory requirements; and	Managing and reporting other statutory requirements are addressed in Section 10.1.3 of this CEMP.
	i) set out the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the construction and environmental performance of the development;	Communication with local community and relevant agencies are addressed in Section 7 of this CEMP.
	(ii) receive, handle, respond to, and record complaints;(iii) resolve any disputes that may arise;	Managing and reporting complaints and disputes are addressed in Section 7.2 of this CEMP.
	(iv) respond to any non-compliance;	Response to any non- compliances is provided within Section 10.1 and 11 of this CEMP.

Condition number	Requirement	Where addressed
	(v) respond to emergencies; and	Response to emergencies is provided within Section 8.1 of this CEMP.
	a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and	Roles and responsibilities are detailed within Section 4.9 of this CEMP.
	 k) a protocol for periodic review of the CEMP and associated subplans and programs. 	Periodic review of the CEMP and CEMP sub-plans are addressed in Section 1.10 of this CEMP.
	The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	Noted

3.3 Revised mitigation measures

Environmental safeguards and mitigation measures are included in Section 23.1.4 of the EIS. During preparation of the Response to DPIE Request for Information, the revised mitigation measures (RMMs) were amended and included in Appendix G.

There are no specific RMMs relevant to the preparation of this CEMP identified in the Response to DPIE Request for Information. RMMs relevant to a specific environmental aspect along with the proposed management measures are dealt within the specific environmental management sub-plan as described in Section 4.3.1.

There are several RMMs that are unassigned to a specific environmental management sub-plan or other project management plans. However these RMMs are applicable during the construction phase of the project and therefore are required to be included under the environmental management system. These RMMs are provided in Table 3.2 below. The management measures that will be implemented for the project in relation to these RMMs are provided in Appendix A5 of this CEMP. A table detailing where each RMM is addressed is provided in Appendix A6 of this CEMP.

Table 3.2 - RMMs that are unassigned to a specific environmental management sub-plan

Reference	Revised mitigation measure	Applicable locations (from RMMs)	Where addressed	How addressed
RMM LV3	Proposed permanent engineering batters and water management measures will be designed to integrate with the existing landforms and natural features.	Whole of proposal	MM1 of Appendix A5 of this CEMP.	Any permanent engineering batters will consider existing landforms and natural features
RMM LV4	Lighting at construction compound and accommodation camps will be designed and operated in accordance with AS4282-2019 Control of the obtrusive effects of outdoor lighting.	Construction compound and accommodatio n camps	MM2 of Appendix A5 of this CEMP.	Lighting at the Buronga construction camp and accommodation camp will be designed generally in accordance with AS482-2019
RMM LV5	Transmission line structures, where possible, are designed: to maximise distance from private residences	Whole of proposal	Not applicable to Stage 1 works.	Not applicable to Stage 1 works. Stage 1 works do not include transmission line structures.

Reference	Revised mitigation measure	Applicable locations (from RMMs)	Where addressed	How addressed
	 to use local vegetation and landform to provide screening from residences or from the road to be regularly spaced to reduce the potential visual impact where the proposal alignment is visible for a long duration, and in open landscapes to be positioned alongside existing transmission line structures where they are adjacent to existing transmission lines where feasible to avoid the location of transmission line structures on locally prominent landforms to minimise clearing along creeklines. 			
RMM LV6	Where the transmission line crosses a roadway, transmission line structures will be located to maximise the distance from the roadway where feasible and where it will achieve an improved visual amenity outcome, where feasible and reasonable.	Transmission line	Not applicable to Stage 1 works.	Not applicable to Stage 1 works. Stage 1 works do not include transmission line structures.
RMM LV8	Opportunities for screening vegetation to be provided on private property will be investigated where, once at a mature height, will reduce an identified visual impact from a residence. This will be undertaken in negotiation with the affected resident. This will be informed by further assessment to determine the extent of the impact and appropriateness of any screening vegetation. Any such screening vegetation will be planted prior to completion of construction and will be maintained by the landholder.	Transmission line	Not applicable to Stage 1 works.	Not applicable to Stage 1 works. No residences have line-of-sight to the Stage 1 works location.
RMM LV9	Lighting at the substation will be designed and operated in accordance with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting.	Buronga substation	Not applicable to Stage 1 works.	Not applicable to Stage 1 works. Stage 1 works relate to site establishment only (refer to Table 2.1).
RMM HR1	The proposal will be designed and constructed in accordance with the Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz – 100 kHz) (International Commission on Nonlonizing Radiation Protection (ICNIRP), 2010) The design will meet the EMF exposure guidelines set out in Table 19-2 of the EIS and worst case scenarios within Transgrid's Transmission Line Design Manual – Major New Build.	All locations	MM3 of Appendix A5 of this CEMP.	The design requirements in relation to electric and magnetic field is outlined in MM3 of Appendix A5 of this CEMP.

3.4 Standards and guidelines

The following standards relating to environmental management that apply to the project include:

• ISO 14001 Environmental Management Systems - Requirements with Guidance for Use; and

• NSW Department of Planning, Industry and Environment, 2020, *Independent Audit Post Approval Requirements*.

Compliance standards, policies and guidelines relevant to specific environmental values are detailed in the respective sub-plans. The requirements of these standards have been taken into account in the preparation of the CEMP and sub-plans and will be considered by SecureEnergy during the preparation of the Work Packs and Work Method Statements.

Any guideline, protocol, Australian Standard or policy reference in the Infrastructure Approval will be taken in the form/version they were in as at the date of the Infrastructure Approval. Updated or revised version of the relevant guideline, protocol, Standard or policy, or a replacement of the document will be considered when the Planning Secretary issues the direction to do so.

4 Environmental management system

The SecureEnergy Management System includes the Environmental Management System. It has been designed to comply with the requirements of ISO 14001 Environmental management systems.

The Health, Safety, Security and Environment Management Manual (HSSE Manual) describes the Environmental Management System for SecureEnergy. Table 4.1 summarises the Environmental Management System components.

Table 4.1 - Environmental Management System components

Management System Component	Description
HSSE Policy & HSSE Management Expectations	The policy sets the overall guidelines and direction to HSSE and represents the commitment of management to the achievement of its aims. The HSSE Management Expectation clearly defines minimum expectations to ensure that all SecureEnergy personnel and subcontractors understand their obligations and accountabilities to contribute to SecureEnergy HSSE culture.
HSSE Operating Standards	The HSSE Operating Standards set out the minimum mandatory performance requirements. Environmental minimum mandatory performance requirements are set out in the following HSSE related Operating Standards:
	Environment Management Operating Standard; and
	Major Accident Event Hazard Management Operating Standard.
HSSE Management Manual	Provides a framework for the HSSE component of the BMS, an overview of the key elements and reference documents.
HSSE Procedures, documents and registers (tools)	Procedures or work practices which provide the detailed steps to be taken to identify risks, work safely, protect the environment, investigate incidents and implement continuous improvement.
HSSE Management Plans – this CEMP and relevant sub-plans	Project specific plans prepared to identify and manage project HSSE risks and achieve the Operating Standards performance requirements.
Project/Site Specific Procedures, Work Instructions	Project and activity specific procedures, risk assessments and work methods to mitigate HSSE hazards. These are prepared by project personnel.

The structure of the environmental management system for the project is shown in Figure 4.1.

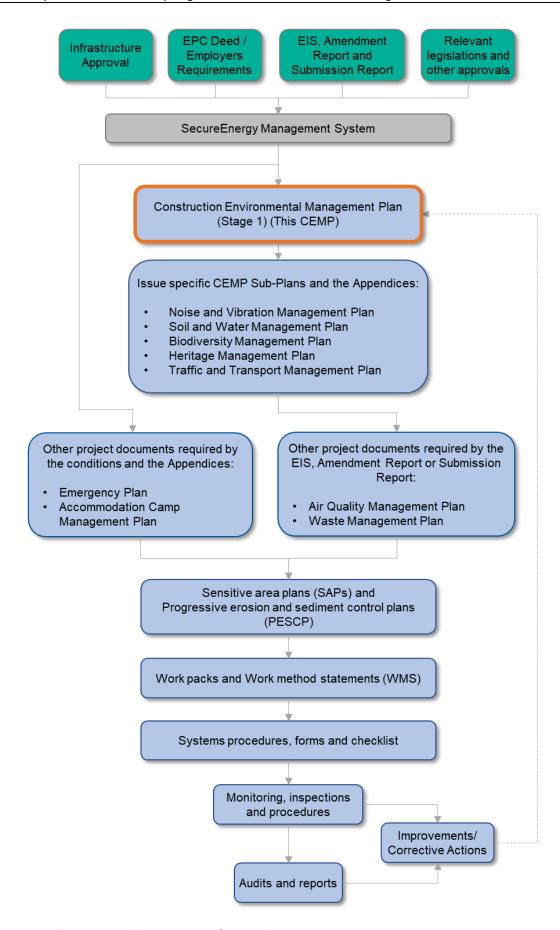


Figure 4.1 - Environmental Management System Process

4.1 Environment policy

SecureEnergy believes that respect for the project location, its surroundings and the communities in which it operates is essential for project success, as well as compliance with all environmental requirements.

SecureEnergy will adopt and use the existing Clough Management Systems. As a result, SecureEnergy will adopt Clough Policies that inform these systems as amended from time to time. SecureEnergy's Policy Model is provided in Appendix A2 along with Clough's Policy for Environment, Sustainability and Community which will be implemented on EnergyConnect.

Policies will be clearly displayed at SecureEnergy main site office facilities and regularly communicated to staff, employees and subcontractors during inductions and toolbox talks.

4.2 Objectives and targets

As a means of assessing environmental performance, environmental objectives (performance measures), targets (criteria) and performance indicators have been established for the project and are provided below in Table 4.2. These objectives and targets have been developed in consideration of requirements in the statutory approvals, contractual requirements, legislative requirements, HSSE performance requirements and significant environmental aspects and impacts.

Exceedances of the proposed targets will be investigated and reported based on the issue. Any exceedances which result in a non-compliance with the Infrastructure Approval will be reported in accordance with Section 10.1.

Table 4.2 - Environmental objectives, targets and performance indicators

Aspects	Objectives (performance measures)	Targets (criteria)	Performance indicators
Compliance	Compliance with Statutory Approvals and Infrastructure Approval	 Full compliance with statutory approvals. No regulatory infringements (PINs or prosecutions). No formal regulatory warning. 	Number of regulatory infringements (PINs or prosecutions), formal regulatory warning, audits.
	Implement and comply with the CEMP and associated management plans	 Zero non-compliances identified during each compliance audit of CEMP and sub-plans. 	Number of non- compliance arising from each audit.
	Address all corrective and preventative actions arising from audits	All corrective and preventative actions arising from audits closed out within specific timeframes.	Action close-out timing statistics in corrective and preventative action close-out reports.
Incident management and response	Ensure timely communication of incidents Minimise the risk of an incident by identifying risks and developing actions to minimise those risks	 All incidents reported in accordance with this management plan. All risks reviewed in accordance with the SecureEnergy management system. 	Follow up action of incidents as recorded in incident reports.
Engage with stakeholders and the broader community, minimise complaints and respond to any complaints within a suitable timeframe	Disseminate regular project updates and other information to keep the community informed of the project. Record and respond to complaints within a timely manner.	 All project updates provided within the timeframes specific within the Community Communication Strategy. All complaints are review within the timeframes specific within the Community Communication Strategy. 	Timeliness of project updates per project website; and timeliness of complaints response as recorded on complaints register.
Sustainability	Promote sustainable infrastructure.	Achieve an ISCA verified 'Design' and 'As-built' rating of Excellent under v1.2 of the IS rating tool.	ISCA rating

Aspects	Objectives (performance measures)	Targets (criteria)	Performance indicators
Biodiversity	Minimise and manage the impacts of the project on biodiversity.	 No exceedance to clearing values of known biodiversity including flora and fauna species as specified in condition D25. 	Total clearing area as recorded on clearing register.
Heritage	Minimise and manage the impacts of the project on Aboriginal and non-Aboriginal heritage items within the approved project corridor.	No harm to known Aboriginal and known non-Aboriginal heritage.	Number of incidents involving harm to known Aboriginal heritage objects or known non-Aboriginal heritage items.
Training and improvement	Provide adequate training to ensure construction activities are undertaken safely and with minimal risk to the environment. Continuously improve environmental performance	 Regular environmental training that focuses on the specific project activities and associated environmental risks. Regular pre-start meetings and toolbox talks in accordance with Section 6. 	Records of induction, toolbox talks with environmental focus, daily pre-start meetings.
Inspections and audits	Completion of weekly inspections and audits	100% completion of scheduled audits and weekly inspections.	Environmental inspections, audits.

4.3 Construction Environmental Management Plan

This CEMP, as shown in Figure 4.1, is the overarching management tool in relation to environmental performance during Stage 1 of the project delivery. The CEMP describes the construction environmental management framework for the project and the system for minimising and managing environmental risks.

The CEMP details the management plans which have been, or will be, prepared to address specific environmental aspects of the project, and outlines the environmental management practices that are to be followed during construction. It provides the overall framework for the system to ensure environmental impacts are minimised and legislative and other requirements are fulfilled.

4.3.1 CEMP sub-plans

A number of specific environmental management sub-plans (CEMP sub-plans) have been prepared to support the CEMP, as outlined in Figure 4.2. Table 4.3 list the CEMP sub-plans that are required under condition B2 of the Infrastructure Approval. The sub-plans document the environmental aspects, impacts and management measures for each key environmental value. The sub-plans are provided in Appendix B.

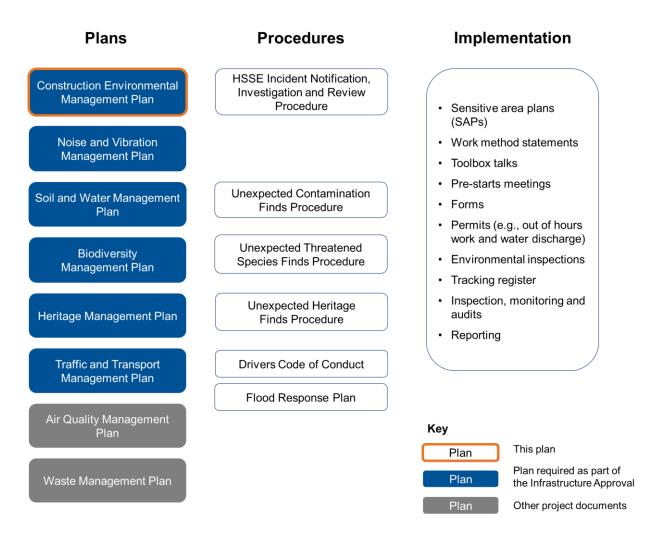


Figure 4.2 - CEMP framework

Table 4.3 - CEMP and CEMP sub-plans

Document name	Condition	Applicable to Stage 1	Document Number	Location
Construction Environmental Management Plan	B1	Yes	45860-HSE-PL-D-0003	This plan
Traffic and Transport Management Plan (TTMP)	D40	Yes	45860-HSE-PL-D-0004	Appendix B1 TTMP
Noise and Vibration Management Plan (NVMP)	D13	Yes	45860-HSE-PL-D-0005	Appendix B2 NVMP
Biodiversity Management Plan (BMP)	D28	Yes	45680-HSE-PL-D-0006	Appendix B3 BMP
Soil and Water Management Plan (SWMP)	D24	Yes	45860-HSE-PL-D-0008	Appendix B4 SWMP
Heritage Management Plan (HMP)	D34	Yes	45860-HSE-PL-D-0009	Appendix B5 HMP

4.3.2 Other approval documents

Other documents that are required by the Infrastructure Approval are provided in Table 4.4.

Table 4.4 - Other approval documents

Document name	Condition	Document Number
Emergency Plan	D47	45860-HSE-PL-D-0025
Accommodation Camp Management Plan	D52	45860-HSE-PL-G-1027
Local Business and Employment Strategy	D53	5860-CM-PL-G-1002

4.4 Work Packs and Work Method Statements

Work Packs describe construction implementation in detail. The preparation of Work Packs involves a comprehensive review of the requirements of many aspects of project delivery, including design, construction, environment and health and safety. Work Packs provide specific instruction on how to construct and undertake certain elements of the project. As required, Work Packs will incorporate procedures relevant to site-specific activities, to reduce risk and ensure ongoing environmental compliance. These measures are based on relevant measures in the CEMP and sub-plans.

Work Method Statements (WMSs) are developed as part of the preparation of every Work Pack. WMSs set out the construction methodology for a particular activity or set of activities, specific to the project and incorporate work-specific environmental hazard assessments. WMSs are the document tools to transform the relevant management measures in the CEMP and sub-plans into actions to be implemented during the undertaking of project activities. The WMSs will ensure that location and activity-specific environmental features and risks (e.g. potential disturbance to threatened species habitat during clearing) are managed.

WMSs are typically prepared and reviewed by the construction team in consultation with the environmental team. The relevant environmental controls and management measures are incorporated into the WMS. The site personnel and sub-contractors involved in the relevant activities will be briefed on the requirements in the WMS, with a toolbox talk or specific WMS briefing held prior to the commencement of the works (refer to Section 6 for further details). All construction personnel and sub-contractors undertaking tasks governed by the Work Packs and WMSs must acknowledge that they have read and understood their obligations prior to commencing work.

4.5 Sensitive area plans

A set of sensitive area plans (SAPs) will be prepared to support the identification and appropriate management of key environmental features associated with the project. SAPs will be developed, reviewed by the environmental team. The SAPs will identify areas/features of environmental and heritage sensitivity and 'no go' zones, and will be included in the project Work Packs to help identify key risk areas, and promote ongoing communication to construction personnel.

Sensitive area plans include information pertaining, but not limited to:

- flora features, including threatened species and endangered ecological communities;
- Aboriginal and non-Aboriginal heritage sites;
- watercourses;
- known fauna habitat to be protected (i.e. hollow bearing trees);
- areas of vegetation to be retained;
- clearing limit boundary; and
- · any designated no-go zones.

4.6 Progressive erosion and sediment control plans

Progressive erosion and sediment control plans (PESCPs) will be developed in accordance with the principles outlined in the erosion and sediment control strategy provided in the *Soil and Water Management Plan* (45860-HSE-PL-D-0008). The PESCPs will show the site layout and approximate

location of erosion and sediment control structures on-site. PESCPs will be updated as required as sites and associated erosion and sediment control requirements change.

A Certified Professional in Erosion and Sediment Control will prepare an Erosion and Sediment Control Plan for the project. Environmental staff will then typically develop any PESCPs in consultation with Project Engineers, Superintendents and Supervisors. This will ensure that erosion and sediment control management is incorporated into the planning stage of construction activities and is coordinated in its approach.

The Environmental Manager will approve PESCPs in the first instance. Minor changes thereafter will be approved by environment staff in consultation with the Environmental Manager, as required.

PESCPs are designed for use as a practical guide and may be produced in conjunction with Work Packs or WMSs. For further details regarding soil and water management refer to the *Soil and Water Management Plan* (45860-HSE-PL-D-0008).

4.7 Procedures, forms and other documents

Other documents such as project-specific procedures and strategies have been developed. These are provided in Table 4.5 below.

Table 4.5 - Procedures, forms and other documents

Document name	Document Number	Location
Unexpected Heritage Finds Procedure	45860-HSE-PR-G-1003	Appendix A of the HMP
Unexpected Threatened Species Finds Procedure	45860-HSE-PR-D-0002	Appendix A of the BMP
Pre-clearing and Clearing Procedure	45860-HSE-PR-G-1008	Appendix B of the BMP
Fauna Handling Procedure	45860-HSE-PR-G-1005	Appendix C of the BMP
Biosecurity Management Plan	45860-HSE-PL-D-0003	Appendix D of the BMP
Erosion and Sediment Control Strategy	45860-HSE-PR-G-1002	Appendix A of the SWMP
Unexpected Contamination Finds Procedure	45860-HSE-PR-D-0003	Appendix B of the SWMP
Spill Response Procedure	45860-HSE-PR-G-1002	Appendix C of the SWMP
Dewatering Procedure	45860-HSE-PR-G-1004	Appendix D of the SWMP
Out-Of-Hours-Work Protocol	45860-HSE-PR-D-0001	Appendix A of the NVMP
Drivers Code of Conduct	45860-HSE-PR-G-1009	Appendix A of the TTMP
Flood Response Plan	45860-HSE-PL-D-0010	Appendix B of the TTMP

4.8 Document control and records

All project documents are to be numbered, approved, revised, transmitted, and stored in accordance with the *Project Document Control Plan* (45860-IM-PL-G-0003).

Records will be developed and maintained by SecureEnergy including:

- · training records;
- incident reports;
- · audit and inspection forms;
- · monitoring results; and
- waste register including volume of waste to landfill, waste recycled, and waste disposed of offsite.

4.9 Roles and responsibilities

4.9.1 Organisational structure

For illustrative purposes, Figure 4.3 is provided as a simplified figure to represent SecureEnergy's organisation structure.

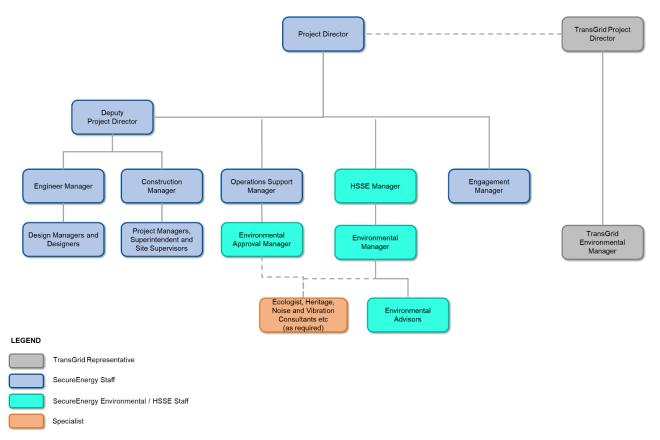


Figure 4.3 - Key roles within the organisation structure

SecureEnergy's Project Director, in consultation with functional managers, will ensure that appropriate resources are available to effectively manage the implementation of the CEMP during delivery of the project.

All SecureEnergy staff, subcontractors and visitors are required to operate in accordance with this CEMP and related environmental management plans during construction.

The project environmental management structure incorporates the following site personnel:

- Environmental Manager responsible for overall management of the CEMP and environmental management plans; and
- Environmental Advisors to assist in implementing and monitoring measures in the CEMP and environmental management plans.

4.9.2 Roles and responsibilities

Further detail regarding the roles and responsibilities is provided within Table 4.6.

Table 4.6 - Environmental roles and responsibilities

Role	Responsibilities
Appointed Roles	
Environmental Representative	 The responsibilities of the Environmental Representative (ER) include: review the documents identified in Infrastructure Approval and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements under the Infrastructure Approval; assist the Department in the resolution of community complaints as requested by the Planning Secretary; and consider and approve any minor amendments made to the plans that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and other documents approved by the Planning Secretary. Note the ER will be a suitably qualified and experienced person, approved by the Planning Secretary no later than one week before project commencement. The ER must not have been
	not involved in the preparation of the EIS documents, and is independent from the design and construction of the development.
Transgrid	
Transgrid Project Director	The environmental responsibilities of the Transgrid Project Director include: monitor the environmental performance of the project in relation to Transgrid requirements; liaise with relevant stakeholders; attend project meetings.
Transgrid Environmental Manager	 The responsibilities of the Transgrid Environmental Manager include: liaise between SecureEnergy and stakeholders (including government agencies) as required; undertake periodic inspections of the project sites to identify environmental non-compliances; review changes to the project for consistency with the project environmental assessment and approval documentation; provide guidance and where appropriate, monitor compliance with DPIE post approval document submission requirements; review environmental management plans and related documents prepared for the project; and
	 monitor the environmental performance of the project in relation to Transgrid requirements and DPIE post-approval document submission requirements.
SecureEnergy	
Project Director	 The environmental responsibilities of the Project Director include: overall delivery of the project program; manage all key aspects of project performance, including environmental performance; undertake actions in accordance with the project's due diligence framework; define and refine project management philosophies, capabilities, processes and tools; ensure project practices and on-site activities are conducted in accordance with project policies and procedures; ensure personnel delegated responsibility for environmental management are adequately trained and competent to implement the requirements of the CEMP; direct activities to ensure resource needs are accurately forecasted and linked to the project, including the identification of skill and behaviour requirements; ensure personnel delegated responsibility for environmental management are adequately trained and competent to implement the requirements of the CEMP; ensure resources are available to enable execution of project environmental management activities and project emergency response systems; drive the creation of systems, practices and behaviours that promote the identification and appropriate management of potential risks and opportunities; lead negotiations with Transgrid to achieve an agreed resolution of complaints and non-

Role	Responsibilities
	approve all management plans prior to their implementation; and
	attend and participate in environmental meetings as appropriate.
Deputy Project Director	The environmental responsibilities of the Deputy Project Director include:
	support the overall delivery of the project program;
	manage key aspects of project performance, including environmental performance;
	undertake actions in accordance with the project's due diligence framework;
	enforce the project management philosophies, capabilities, processes and tools;
	 ensure project practices and on-site activities are conducted in accordance with project policies and procedures;
	 ensure personnel delegated responsibility for environmental management are adequately trained and competent to implement the requirements of the CEMP;
	 direct activities to ensure resource needs are accurately forecasted and linked to the project, including the identification of skill and behaviour requirements;
	 ensure resources are available to enable execution of project environmental management activities and project emergency response systems;
	ensure resources are available to eliminate or minimise environmental hazards;
	participate in incident investigations and review all incident reports as appropriate;
	 support negotiations with Transgrid to achieve an agreed resolution of complaints and non- conformance reports (NCR);
	ensure all management plans are fully developed and implemented; and
	attend and participate in environmental meetings as appropriate.
Construction	The environmental responsibilities of the Construction Manager include:
Manager	delivery of the construction aspects of the project;
	ensure resources are available to eliminate or minimise environmental hazards;
	 ensure subcontractors understands their environmental responsibilities as required in the Contract;
	participate in incident investigations and review all incident reports;
	arrange and participate in HAZID workshops;
	participate in workplace inspections;
	review the audit findings and close out reports;
	review the overall project environmental performance;
	attend and participate in environmental meetings as appropriate;
	participate in Target Zero commitment workshop;
	review work planning requirements;
	aware of the relevant environmental laws, permits and standards;
	 provide construction and field management and supervisors with environmental information current to their requirements;
	 ensure environmental standards developed for each activity meet with SecureEnergy requirements
	schedule and coordinate site-based environmental activities;
	interface with client environmental personnel during their site visits; and
	provide project line management with feedback on environmental performance.
Health, Safety,	The responsibilities of the Health, Safety, Security and Environment Manager include:
Security & Environment	 deliver the HSSE aspects of the project in accordance with contract and legislative requirements;
Manager	communicate the HSSE requirements to the project Management and HSSE Teams;
	 review HSSE standards and plans developed for each project to ensure that legislative requirements are met;
	 review overall HSSE performance and report to the project Management and Corporate HSSE Manager;
	 interface with major subcontractors and Transgrid management, regulatory and with HSSE personnel as required regarding HSSE matters;
	coordinate third party certification audits;

Role	Responsibilities
	specify resources to enable execution of HSSE activities on-site;
	specify resources to enable execution of emergency response systems on-site;
	arrange for and participate in HAZID workshops;
	 provide HSSE Advisors, project line management and subcontractor with feedback on HSSE performance;
	participate in the Target Zero commitment workshop;
	implement and coordinate Target Zero activities and strategies;
	receive and circulate relevant HSSE information;
	coordinate and participate in scheduled HSSE audits and reviews;
	statistical analysis and incident trend reviews;
	develop training and induction schedules and content;
	 deliver the training and induction material such as site induction, toolbox talks and pre-start meetings;
	attend and participate in HSSE meetings as required;
	coordinate and participate in workplace inspections; and
	record, monitor and follow up close out of action items in InControl.
Environmental	The responsibilities of the Environmental Approvals Manager include:
Approvals Manager	communicate the environmental approval requirements to the Project Management and Environmental Teams;
_	communicate and liaise with Transgrid in relation to approval documents and matters;
	develop and review the CEMP and SecureEnergy management plans;
	review, and where required, revise environmental management documents;
	 review proposed project changes and where required, prepare consistency assessments. Where consistency assessments are required Transgrid's Environmental Manager and the Environmental Representative will be informed;
	develop training and induction content, where required;
	organise and participate in meetings as required; and
	 specify the resources required to develop environmental approval documents.
	The role of the Environmental Approvals Manager will be phased out depending on SecureEnergy's requirements and the stage of the project.
Environmental	The responsibilities of the Environmental Manager include:
Manager	implement and deliver the environmental requirements of the project;
	communicate the environmental requirements to the Project Management and Environmental Teams;
	communicate and liaise with Transgrid in relation to environmental performance and compliance matters;
	implement the CEMP and SecureEnergy management plans;
	 monitor and report compliance of the works in relation to the approved documents including the environmental objectives set in Table 4.2;
	review, and where required, revise environmental management documents;
	 review proposed changes to design and construction methodologies and where required, communicate them to the Environmental Approvals Manager to determine if consistency assessments are required;
	specify the resources required to enable execution of environmental activities on-site;
	specify the resources required to enable execution of emergency response systems on-site;
	arrange and participate in HAZID workshops;
	 provide environmental coordinators, project line management, and SecureEnergy with feedback on environmental performance;
	participate in the Target Zero commitment workshop;
	receive and circulate the relevant environmental information;
	coordinate and participate in scheduled environmental audits and reviews;
	undertake statistical analysis and environmental incident trend reviews;
	develop training and induction content;

Role	Responsibilities
	deliver the environmental component of training and induction such as site induction, toolbox
	talks and pre-start meetings;
	promote environmental management improvements initiatives;
	organise and participate in environmental meetings as required;
	coordinate and participate in workplace inspections;
	record, monitor and follow up close out of action items in InControl;
	responsible for the overall environmental performance of the site;
	provide leadership in the implementation of all environmental initiatives; and
	specify the resources required to enable execution of environmental activities.
Environmental Advisors	The responsibilities of the Environmental Advisor include:
	 communicate of environmental requirements to project personnel including Superintendents and Supervisors;
	 being accountable for ongoing development and implementation of project environmental activities and practices;
	record, monitor and follow up close out of action items;
	develop and update environmental management documents;
	ensure corrective actions are implemented;
	participate in Target Zero workshops;
	comply with statutory requirements, including duty of care;
	liaise with supervisors on relevant environmental issues;
	organise and participate in environmental meetings;
	 report and investigate all environment incidents in the area of control;
	review and close out environmental incident reports;
	 deliver the environmental component of training and induction such as site induction, toolbox talks and pre-start meetings;
	 provide support and direction to all supervisors through positive discussions on environmental initiatives;
	conduct weekly workplace inspections;
	 monitor high environmental risk activities and the commencement of activities in new areas or areas with significant environmental sensitivities;
	support employees to perform their work in an environmentally conscious manner;
	report all incidents and hazards to management;
	monitor the use and maintenance of spill kits at all work sites; and
	ensure work group employees participate in relevant environmental activities.
Supervisors	The environmental responsibilities of the Supervisors include:
_	plan for and incorporating environmental management into all work plans and activities;
	 ensure that instructions are issued and adequate information provided to field-based employees which relate to environmental risks on-site;
	participate in HAZID workshops and audits;
	motivate employees to report all environmental incidents;
	participate in Target Zero workshops;
	 conduct inspections of their work area per the Audit and Inspection Schedule;
	 plan and incorporate environmental management into all work plans and activities;
	open and maintain external communication during emergencies;
	maintain a log of communications sent and received during an emergency;
	report all incidents and hazards to management;
	comply with statutory requirements, including duty of care;
	report hazardous conditions;
	participate in any relevant environmental training;
	 deliver the environmental component of training and induction such as toolbox talks and pre- start meetings;
	provide suggestions to improve environmental management on the project;

Role	Responsibilities
	report any near miss or environmental incidents; and
	participate in site environmental meetings as required.
All personnel, including subcontractors	The environmental responsibilities of all personnel include:
	undertake works in accordance with the Clough's Management System and management plans;
	follow directions from senior staff and project environmental personnel in relation to environmental matters;
	follow the instructions in the WMS in relation to environmental matters;
	participate in any relevant environmental training;
	report any near miss or environmental incidents to their Supervisors; and
	provide suggestions to improve environmental management on the project.

4.9.3 Other environmental resources

Specialist consultants and subcontractors will be engaged for environmental support roles, as required, such as:

- ecologists for pre-clearing survey and assessment including tree hollows, identification of exclusion zones for retained threatened flora populations;
- noise and vibration specialists for noise modelling, establishment and maintenance of monitoring equipment, and ongoing advice throughout construction;
- heritage consultants for review of the Aboriginal and non-Aboriginal heritage management subplans and archaeological survey, test excavations, salvage and reporting where required; and
- other resources as required during the course of the project.

4.9.4 Subcontractors and suppliers

All subcontractors will work in accordance with this CEMP, sub-plans and relevant procedures. Subcontractors are required to carry out their work in accordance with contract instructions and in an environmentally sound manner.

Subcontractors will not normally be required to prepare and implement a separate Environmental Management Plan in addition to this CEMP, except where the risk of environmental harm from the subcontractor's activities is assessed as significant or the subcontractor has control of a specific project area. SecureEnergy will ensure that any separate Environmental Management Plans are consistent with this CEMP, the relevant conditions of approval and legislative requirements.

All subcontractor personnel are required to attend a project induction, which includes an environment and sustainability component and task-specific training (if relevant) before they commence any work on-site. The Environmental Manager, or delegate, will confirm and implement requirements for effective subcontractor control based on known project risks and demonstrated subcontractor performance.

All suppliers will be required to comply with any relevant requirements of this CEMP and associated sub-plans, including sustainability requirements.

The Environmental Manager will confirm and implement actions to ensure suppliers and subcontractors are aware of the requirements within the CEMP that are relevant. This will occur during the procurement phase including final subcontractor and supplier assessment and selection and then carried through into the construction phase.

5 Environmental risk management

5.1 Risk and hazard management

Hazard and risk management approach will be used to determine the potential severity and likelihood of an activity's impact on the environment and to prioritise its significance.

Risk identification, assessment and management is part of the Clough Management System and will be undertaken in accordance with procedure *CORP-HSE-PR-G-0072 HSSE*, *Risk Management Procedure*. The procedure is consistent with *AS/NZS ISO 31000:2009 Australian Standard Risk Management*.

Over the life of the project, hazards and risks will be identified, assessed and controlled through the use of a number of different risk management tools, primarily risk assessments.

The objectives of undertaking hazard and risk assessments are to:

- identify hazardous activities, events or outcomes that have the potential to adversely affect the local environment and/or human health/property;
- assess hazards and risks and prioritised them using a consistent process aligned to Clough risk management principles;
- determine appropriate control measures;
- assess whether hazards and risk issues can be managed by the implementation of environmental management measures; and
- qualitatively evaluate residual risk with implementation of the protection measures.

Following identification and assessment the resultant control measures will be communicated, implemented and monitored to confirm their effectiveness. WMSs and Work Packs will be updated to provide specific instructions on how to conduct components of the construction. These will include the relevant environmental controls to be implemented which are identified through the hazard and risk assessment process.

Sensitive area plans will be used in conjunction with WMSs or Work Packs to help identify key risk areas and to promote ongoing communication to construction personnel during the project.

A summary of the Clough risk management processes, their purpose, the methodologies used and the stage in the project lifecycle to which they apply is provided in Table 5.1 and diagrammatically in Figure 5.1.

Table 5.1 - Project HSSE Risk Assessment Processes

Risk	Description			ı	Appli	catio	n		Reference Procedures			
Assessment Process		Methodology	Corporate	Business Division	New Opportunity	Project Planning	Project Execution	Project Close-out				
Technical HSSE												
Design risks	Identify, assess and document inherent design risks	HAZID, HAZOP, FMEA			✓	✓		✓	Safety in Design Procedure	CORP- ENG-PR- G-0016		
Design reviews - construction, operation, maintenance	Identify, assess and mitigation of HSSE hazards introduced by the design when facility being	HAZID, HAZOP			√	✓			Safety in Design Procedure	CORP- ENG-PR- G-0016		

Risk				1	Appli	catio	n		Reference Procedures	
Assessment Process		Methodology	Corporate	Business Division	New Opportunity	Project Planning	Project Execution	Project Close-out		
	constructed, operated or maintained									
Fire & Explosion analysis	Identify, assess and control potential sources of fire & explosion, and consequence mitigation through design	Fire and Explosion Study			√	√			Safety in Design Procedure	CORP- ENG-PR- G-0016
Threat Specific I	HSSE Hazard Assessme	nt (where app	olicab	le to p	orojed	ct)				
Environmental/ Social Impact Assessment	Identify, assess and mitigate environment and community impacts	EIA, HAZID, Social Impact Study	√	✓		√			HSSE Risk Management Procedure	CORP- HSE-PR- G-0072
Natural Disasters Assessment (Emergency Events)	Identify, assess and mitigate potential natural disaster events which may affect the site (e.g. cyclone, wild fire, tsunami)	HAZID	√	✓		✓			HSSE Risk Management Procedure	CORP- HSE-PR- G-0072
Task Based HSS	E Hazard Assessment									
Project HSSE Assessment	Identify, assess and control potential HSSE impacts specific to the project & Site	HAZID				1		√	HSSE Risk Management Procedure	CORP- HSE-PR- G-0072
Construction Package HSSE Assessment	Identify, assess and control potential HSSE impacts specific to the Construction package	HAZID				✓	√	✓	HSSE Risk Management Procedure	CORP- HSE-PR- G-0072
Subcontractor HSSE Assessment	Assess the HSSE capability of subcontractors to inform management strategy Identify, assess and control potential HSSE impacts of contract scope	PRE- QUAL/HA ZID				✓	✓	✓	HSSE Risk Management Procedure	CORP- HSE-PR- G-0072
Work Team Task Assessment	Work teams identify, assess and control HSSE hazards of planned work	JHA					√	✓	HSSE Risk Management Procedure	CORP- HSE-PR- G-0072
Personal Task Assessment	Individuals identify, assess and control HSSE hazards of planned task	TAKE 5					√	√	HSSE Risk Management Procedure	CORP- HSE-PR- G-0072

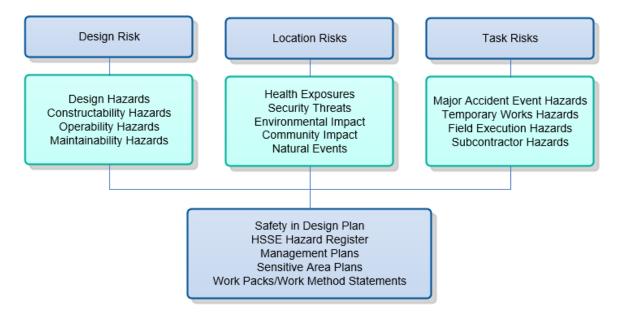


Figure 5.1 - HSSE Risk Management Framework

5.2 Environmental aspect and impact register

The environmental aspects of key construction activities and associated potential impacts will be continually identified, assessed and controlled throughout the project and included within the environmental risk register. The environmental aspect and impact register, provided in Appendix A3, will form a part of the consolidated risk register managed and reported in accordance with the *Risk Management Plan* (45860-QM-PL-G-1002).

The ongoing determination of environmental aspects and impacts will be achieved through the risk management processes outlined above, which results in the maintenance of a list of environmental risks (aspects and impacts), corresponding risk mitigation strategy and risk ranking for each risk. Each environmental risk is categorised, based on the following:

- the environmental aspect;
- type of potential impact (or consequence); and
- likelihood of occurrence.

Risk management measures are identified to reduce the environmental impacts of each activities to as low as reasonably practicable. These management measures are included in the Environmental Aspect and Impact Register. Risk management measures have been included in the relevant CEMP sub-plans, and will be addressed in relevant WMSs and communicated to the workforce as described in Section 4.4.

SecureEnergy will maintain the project risk register throughout the construction phase of the project. Risks will be required to be reviewed on a quarterly basis and will also be reviewed in response to incidents, changes in legal requirements, change in project scope, findings of inspections and audits and management reviews.

6 Training and awareness

Environmental training is an important means to raise environmental awareness and positively influence the attitude of workers engaged in the project whilst ensuring they are aware of their obligation and the requirements of this CEMP. Internal and on-the-job training will be provided by SecureEnergy on a regular basis for all employees and subcontractors.

Training will be delivered in accordance with the *HSSE Training Management Plan* (45860-HSE-PL-G-1011), with training and awareness delivered through:

- Target Zero leadership and behaviour programs;
- site inductions:
- · toolbox talks:
- · daily pre-start meetings; and
- WMS briefings and/or targeted environmental briefings e.g. erosion and sediment control, heritage and spill response.

Where required, the Environmental Manager (or delegate) will prepare and deliver the environmental components of the training material to highlight specific environmental and heritage sensitivities, risks and requirements related to the project or upcoming construction activities. Refer to the sections below for further detail.

6.1 Site induction

All personnel (including sub-contractors) will be required to attend a compulsory site induction that includes an environmental component prior to commencement on-site. This is done to ensure all personnel involved in the project are aware of the requirements of the CEMP and to ensure the implementation of environmental management measures. The Environmental Manager (or delegate) will prepare and deliver the environmental component of the site induction.

The environmental component will include an overview of the following elements:

- relevant details of the CEMP;
- relevant conditions of Infrastructure Approvals, environmental licences and permits;
- the location of key features of environmental and heritage sensitivity (i.e. heritage sites, threatened species and ecological communities, residences) and where this information can be found;
- relevant environmental management requirements and responsibilities;
- key management measures for the control of environmental issues;
- notification and response requirements in the event of unexpected finds (i.e. for heritage, contaminated land or threatened species);
- regulatory penalties and consequences of non-compliance:
- incident response and reporting; and
- emergency response and evacuation (fire and flooding).

6.2 Toolbox talks

Toolbox talks will be delivered by various SecureEnergy personnel such as Construction Manager, HSSE Manager and Environmental Manager, depending on the primary focus and content of the toolbox talk. Toolbox talks are necessary to raise the workforce's level of project and environmental awareness. Toolbox talks will generally occur monthly.

Toolbox talks will be tailored to specific environmental issues relevant to upcoming works and current environmental performance matters and will include general and specific discussion of the key environmental aspects of the project.

6.3 Daily pre-start meetings

Daily pre-start meetings will be conducted by the Supervisors prior to the start of work each day to inform workers of key safety, environmental and heritage sensitivity, activity coordination considerations and other information that may be relevant in the performance of the day's work.

6.4 WMS briefings and/or targeted environmental briefings

As outlined in Section 4.4, WMSs are developed as part of the preparation of every Work Pack. WMSs set out the construction methodology for a particular activity or set of activities, specific to the project and incorporate work-specific environmental hazard assessments. WMS briefing will be delivered by the Construction Manager (or delegate) or Supervisor to communicate key requirements, actions, processes and controls to construction personnel.

Targeted environmental briefings will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. The targeted environmental briefings will communicate the potential environmental risks/impacts of the activity and the mitigation measures to reduce the environmental risk. Targeted environmental briefings will be delivered by the Environmental Manager (or delegate).

7 Communication and complaints management

7.1 Communication

SecureEnergy and Transgrid are committed to ensuring effective communication is undertaken on a regular basis at all levels of the project. A high level of communication is an important factor in the successful and correct delivery of environmental outcomes on the project and it will ensure environmental performance is continually communicated, understood and improved.

7.1.1 Internal communication

The methods of internal (on-site) communication will include:

- · inductions;
- · toolbox talks:
- pre-start meetings;
- · alerts, bulletins and/or initiatives; and
- · Work Packs.

SecureEnergy will discuss environmental issues as a regular component of their toolbox and site meeting agenda.

SecureEnergy will present environmental communications to its workforce on a minimum weekly basis. This will include information on the management of environmental risks or key site environmental issues as required. Records of the topics, attendance and presenter's name will be maintained.

7.1.2 External communication

A Community Communication Strategy (CCS) (45860-CM-PL-G-1001) has been prepared for the project. The CCS provides a framework in the management of community and stakeholder communication and engagement. The CCS identifies the community engagement objectives, the people and organisations that will be consulted with, the delivery framework and potential issues the project needs to manage during project delivery.

The CCS also provides information on the communication tools and protocols which will support implementation, and descriptions of how community stakeholders will be kept informed of, and consulted about, the project throughout the delivery phase.

In particular, the CCS details the following elements:

- identification of community and key external stakeholders;
- procedures and mechanisms for providing information to the community and key stakeholders;
- opportunities and provision for the community to attend the construction site for visits, taking into consideration health and safety requirements;
- the formation of issue or location-based community forums;
- procedures and mechanisms for how the project will receive and respond to community feedback, enquiries and complaints; and
- procedures that explains how disputes will be resolved.

The community and stakeholders will be kept informed through the below framework:

- inform to provide balanced and objective information to assist in understanding a problem/ options;
- consult to obtain feedback on options and /or decisions;

- involve work with stakeholders to ensure concerns and aspirations are understood and considered; and
- collaborate form a partnership with stakeholders in each aspect of the decision.

The communication approach to local communities and agencies is predominately aligned within the Inform and Consult stages with the focus on early consultation and providing up-to-date project information. There will however be opportunities in the Involve and Collaborate stage particularly through local employment, local supply chains and Aboriginal participation programs.

Communication tools which will be used by the project to inform stakeholders and the community will include but not be limited to:

- notifications of construction activities;
- notification of out of hours works (as required);
- written correspondence (letters/emails);
- advertisements (as required);
- newsletters:
- · meetings;
- the project website which is located at https://www.projectenergyconnect.com.au; and
- enquiries and complaints line (24 hour) on 1800 560 577.

7.2 Complaints management

The protocol for managing and reporting any complaints is described in the *Enquiries, Complaint* and *Dispute Resolution Management Procedure* (45860-CON-PR-G-1001) provided in the CCS. The procedure includes a complaints management process which outlines how SecureEnergy will respond to complaints related to the project.

The complaints management process will use the Consultation Manager database to record information on all complaints received about the project during construction.

The key principles of the complaint management process is provided in Table 7.1 below. Refer to the CCS for further details.

Table 7.1 - Key principles for effective complaint and dispute resolution

Action	Description
Acknowledge	SecureEnergy staff should respect the communities' right to voice their concerns. All complaints received should be acknowledged to the complainant either by telephone or in writing.
Resolve	SecureEnergy staff should aim at first contact resolution for all community concerns. SecureEnergy staff should investigate community concerns in detail before negotiating a resolution. All SecureEnergy staff should use their relevant discretions to achieve a mutually acceptable resolution to complaints.
Escalate	All SecureEnergy staff should aim to escalate the complaint if the community member remains dissatisfied with the investigation and/or resolution offered by their first point of contact at SecureEnergy. All complaints where community request to speak to a higher-level representative, should also be escalated.
Record	SecureEnergy staff should aim through the Engagement Team at recording all relevant information, on the community account in Consultation Manager System, regarding customer concerns along with details of all discussions had with the community member in the process of investigating and/resolving the complaint. Detailed information on the resolutions offered to address community concerns should also be clearly recorded.
Communicate	SecureEnergy staff should remain in constant touch with the community member while their concerns are being investigated. The community member should be informed of all steps of the investigation and the resulting outcome at appropriate times.

Action	Description
Report	SecureEnergy should report on all complaints received to the SecureEnergy Management Team and Transgrid. The reporting should include information on the number as well as type of complaints being received, the status of these complaints from time to time and the resulting outcomes or resolutions offered to close them.
Feedback	The SecureEnergy Engagement Team should aim at regular and intensive reviews to identify possible trends in the complaints being received. These reviews should be aimed at highlighting improvements required to avoid complaints being repeated.
Action	SecureEnergy should aim at effective implementation of improvements suggested directly by the community or highlighted by complaint trends.

The complaints management system will include a process to manage complaints including receiving, recording, tracking and responding to complaints within a defined timeframe. If a complaint cannot be responded to immediately, a follow up phone call or verbal response will be made to the complainant in accordance with the timeframes detailed below.

The key processes involved in recording complaints and enquiries are as follows:

- all enquiries/complaints will be recorded in a complaint register;
- complaints received for the duration of the project will be acknowledged verbally within 2 hours from the time of complaint unless the complainant agrees otherwise. Any complaints received out of hours will be responded to on the next working day;
- complaints received via email will be acknowledged within 24 hours;
- complaints received via letters will be acknowledged within 5 days of receipt. Where a phone number or email address is supplied, a response will be provided within 24 hours.

The community and stakeholder engagement staff will attend to enquiries and complaints received through the enquiries and complaints 1800 information line, project email address, from letters mailed to the project team, during community meetings or through construction/site staff.

The project enquiries and complaints 1800 number will be included on project communications, including notifications, advertisements, and on the SecureEnergy website.

All complaints will be investigated and dealt with impartially. All correspondence, agreements, resolutions and other relevant information will be recorded in Consultation Manager. The complaints register will be sent to the Environmental Representative on any day a complaint is received. If a complainant is not satisfied with the resolution provided, the complaint can be escalated, and alternative offers of resolution can be discussed.

7.2.1 Dispute resolution

Wherever possible, complaints will be resolved directly between SecureEnergy and the stakeholder.

If a complaints management process has been followed and the issue cannot be resolved, the *Enquiries, Complaint and Dispute Resolution Management Procedure* (45860-CON-PR-G-1001) provides a flowchart that outlines the process to manage and escalate complaints. As part of this procedure, a Community Complaints Mediator will be engaged to address any complaint where a member of the public is not satisfied by SecureEnergy's response. The escalated review process will include an assessment of the details of the complaint received, any findings of the investigation undertaken in response to the complaint, and any further matters raised by the complainant.

If a complaint requires referral to senior management and Transgrid, the complainant will be informed of this and the outcome of the review process.

8 Incidents and emergencies

8.1 Emergency preparedness and emergency response

Emergency management and planning including environmental emergencies will be undertaken in accordance with the Clough management system and relevant procedures. In line with the Clough management system, a three-tiered approach will be adopted for major incidents:

- Level 1 on-site emergencies will be in accordance with the *Project Specific Emergency Preparedness and Response Plan* (45860-HSE-PL-G-1015);
- Level 2 emergency situations where response exceeds the capacity of site resources incidents will be coordinated by the Incident Coordination Team in accordance with *Major Incident Coordination Plan* (CORP-HSE-PL-G-0002); and
- Level 3 an emergency situation where the incident has the potential to, or has impacted, the business in terms of, reputation, and commercial liability. Incidents will be supported by the Major Incident Management Team in accordance with *Major Incident Management Plan* (CORP-HSE-PL-G- 0001).

An *Emergency Plan* (45860-HSE-PL-D-0012) has been prepared for the project in accordance with condition D45 of the Infrastructure Approval. The plan focuses on bushfire emergency management and planning which includes identifying fire risk and hazards as well as management measures that will be implemented to prevent, mitigate or respond to risk of bushfires. The Emergency Plan will include a procedure that would be implemented if there is a fire on-site or in the vicinity of the site.

8.2 Environmental incidents

In the event of an environmental incident, the Incident, Notification and Investigation Procedure Flowchart provided in Appendix A4 will be implemented. The flowchart applies to:

- incidents causing harm to the environment (in excess of predicted impacts described and assessed in the EIS, Submissions Report and Amendment Report);
- incidents resulting in non-compliance with approvals, licences, permits, consents and other legislative requirements; and
- near misses including high potential incidents and/or hazards.

Environmental incidents may include the following events caused by the works:

- chemical spills and leaks (including hydrocarbons);
- accidental spills or other incidents associated with the wastewater treatment plants;
- unauthorised discharge of contaminated waters to the environment;
- unauthorised/unapproved impact to heritage items, artefacts or sites;
- clearing or damage to vegetation outside of the designated clearing areas;
- unauthorised/unapproved damage or interference to threatened species, endangered ecological communities or critical habitat;
- · unauthorised death or injury of native fauna;
- any non-compliance with legislation; and
- inappropriate waste disposal.

All efforts will be undertaken to avoid and reduce impacts of incidents. All site personnel are authorised to suspend a work activity that is likely to cause or actually causing or contributing to an incident. A supervisor/manager may request additional staff be deployed to the site to provide additional capacity or capability to manage the incident.

8.3 Incident notification and reporting

All environmental incidents that occur on the project, regardless of how minor, must be reported to a supervisor by personnel involved or witnesses to the incident immediately after the incident occurs. The Environmental Manager will be notified immediately of any environmental incident. The Environmental Manager will confirm whether the incident has caused or threatens material environmental harm under the POEO Act.

Transgrid will be notified of incidents and near misses immediately. Formal, documented reporting of incidents will be completed using InControl, and will be submitted to Transgrid in accordance with requirements under the Contract. The Environmental Representative will be included on all incident notifications.

If required, all external communication and reporting to the community and stakeholders will be in accordance with the CCS.

8.3.1 Incident notification and reporting in accordance with the Infrastructure Approval

An incident is defined in the Infrastructure Approval as 'An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance'. In addition, material harm is defined in the Infrastructure Approval as the following:

[Material harm] is harm that:

- a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or
- b) results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).

This definition excludes "harm" that is authorised under either this approval or any other statutory approval.

The protocol for managing and reporting incidents will be in accordance with condition E6 and Appendix 3 of the Infrastructure Approval. As such, Transgrid will notify DPIE via the Major Projects website immediately after becoming aware that an incident has occurred. A written notification will then be provided to DPIE via the Major Projects website within seven days after becoming aware of the incident. SecureEnergy will provide the appropriate details to assist Transgrid. The written notification will include the following details:

- identify the development and application number;
- provide details of the incident (date, time, location, a brief description of what occurred and why
 it is classified as an incident);
- identify how the incident was detected;
- identify when the Proponent became aware of the incident;
- identify any actual or potential non-compliance with conditions of consent;
- describe what immediate steps were taken in relation to the incident;
- identify further action(s) that will be taken in relation to the incident; and
- identify a development contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred, or as otherwise agreed by the Planning Secretary, Transgrid will provide DPIE and any relevant public authorities with a detailed report on the incident addressing the following requirements, and any further reports that may be requested:

a summary of the incident;

- outcomes of an incident investigation, including identification of the cause of the incident;
- details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
- details of any communication with other stakeholders regarding the incident.

Corrective and preventative actions will be identified from the incident reports and if required, this CEMP and CEMP-sub-plans will be updated in accordance with Section 1.10.

8.3.2 Incident notification and reporting in accordance with the EPBC Act

SecureEnergy will notify Transgrid of any event that impacts or has the potential to impact upon protected matters, as defined under the EPBC Act, immediately on becoming aware of the occurrence. Appropriate details will be provided to assist Transgrid in notifying DAWE in accordance with the requirements of the EPBC Act Approval (EPBC 2020/8673).

8.3.3 Incident notification and reporting in accordance with the POEO Act

SecureEnergy will notify Transgrid immediately after becoming aware of pollution incidents that causes or threatens material environmental harm to the environment.

Following initial verbal notification to Transgrid, SecureEnergy will notify the following

- · appropriate regulatory authority;
- the EPA (if they are not the appropriate regulatory authority);
- the local authority (if the EPA is the appropriate regulatory authority);
- · Ministry of Health;
- · SafeWork NSW; and
- Fire and Rescue NSW.

The circumstances where this will take place include:

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

Any incidents that present an immediate threat to human health or property are to be reported immediately to 000.

8.3.4 InControl Data Entry

All incident notifications and investigations shall be entered into the incident management system (InControl). This system shall also act as the Incident Register and allows the project to monitor and analyse incident trends. http://inx.australia.corp.clough.com/InControl/Default.aspx

9 Inspections, monitoring and auditing

9.1 Environmental inspections

Implementation of a regular program of inspections is an essential part of the success of work activities. The current proposed inspection schedule is provided in Table 9.1.

The implementation and effectiveness of environmental protection measures described in this CEMP and sub-plans will be inspected and assessed on a weekly basis. A weekly checklist for environmental inspections will be developed, with the purpose of the checklist to:

- provide a surveillance tool to ensure that safeguards are being implemented;
- assess and document the effectiveness of implemented environmental management measures;
- identify where problems might be occurring;
- identify where sound environmental practices are not being implemented; and
- facilitate the identification and early resolution of problems.

Deficiencies and required actions will be analysed and prioritised at the completion of the inspection and timeframes for implementation of corrective actions agreed. Any non-conformances identified through the checklist process will be highlighted and an environmental inspection report (minor issues) or an environmental incident report completed.

SecureEnergy environmental staff and Transgrid environment staff might jointly undertake regular inspections of works sites, and in particular critical activities throughout construction of the project. The frequency of these inspections would vary depending on the complexity and anticipated risks associated with the stage of construction.

Table 9.1 - Inspection schedule

Activity	Frequency	Location	Responsibility	Record
Daily work site inspections	Daily	Immediate work area and equipment in work area	Supervisors	Site diary entry Pre-start sign on
Pre-start equipment inspections	Daily	The equipment/ machinery being used	Equipment/machinery operators	Pre-start checklist
Environmental site inspection	Weekly	Site wide	SecureEnergy Environmental Manager or nominated representative	Site inspection checklist
High risk works inspections	Prior to undertaking of high risk activities	In areas of high environmental sensitivity	SecureEnergy Environmental Manager or nominated representative	Pre-start checklist
Joint environmental site inspection	As required.	Site wide	Transgrid, SecureEnergy Environmental Manager or nominated representative	Transgrid inspection report

9.2 Monitoring

Monitoring will be undertaken to validate the impacts predicted for the project, to measure the effectiveness of environmental controls, and to address any relevant approval requirements.

The activity, description, timing, frequency of proposed monitoring and the relevant CEMP sub-plans in which specific details will be included is summarised in Table 9.2. The monitoring programs range from those involving formal sample collection, analysis and measurement, to those involving a more qualitative assessment. Refer to the relevant CEMP sub-plans for details on the respective monitoring and inspection requirements.

Table 9.2 - Environmental monitoring summary

Condition/RMM	Activity	Management Plan	Description	Frequency and timing
Condition D25 RMM B15	Clearing supervision	Biodiversity Management Plan	Ecological supervision of clearing operations during removal of habitat trees.	In accordance with BMP
RMM LP7	Biosecurity	Biodiversity Management Plan	Visual inspection of the work site and implemented management measures to minimise the risk of offsite transportation of weeds.	In accordance with BMP
RMM HF3	Water quality monitoring program	Soil and Water Management Plan	Monitor the water quality conditions in the Darling River, Darling Anabranch and Murray River.	In accordance with SWMP
Condition D14 RMM NV5 RMM NV8	Noise and vibration monitoring	Noise and Vibration Management Plan	Noise and vibration monitoring program to compare the actual noise and vibration performance during construction against predicted performance.	In accordance with NVMP
Condition D32	Monitoring of the management measures in place to protect heritage features	Heritage Management Plan	Visual inspection of work site, including any fencing along the disturbance boundaries	In accordance with HMP
Condition D38	Traffic and transport monitoring	Traffic and Transport Management Plan	Monitoring of access track conditions, traffic signage and congestion impacts to level of service, and driver code of conduct.	In accordance with TTMP

Irrespective of the type of monitoring conducted, the results will be used to identify potential or actual problems arising from construction processes. Where monitoring results are outside of the expected range, the following process will be implemented. Refer to the specific CEMP sub-plan for further details:

- the results will be analysed by the SecureEnergy Environmental Manager or Environmental Advisor with the view of determining possible causes for the exceedance including a review of the potential construction activities impacting that site of the exceedance;
- a site inspection will be undertaken (where appropriate to assess potential cause);
- where the exceedance relates to construction impacts, the mitigation measures will be reviewed;
 and
- where required, the appropriate corrective and preventative actions will be identified and implemented.

9.3 Auditing

The purpose of auditing is to assess compliance with the CEMP, the Infrastructure Approval and any relevant legal and other requirements (e.g. licences, permits, regulations, contract documentation) and to form a part of continuous improvement described in Section 1.9.

In accordance with condition E11 of the Infrastructure Approval, independent audits will be undertaken in accordance with the *Independent Audit Post Approval Requirements* (2020). Independent audit will be undertaken within 12 weeks from the commencement of construction, follow by six-monthly interval for each subsequent audit until the completion of the construction phase of the project.

The independent audits will be undertaken in accordance with the requirements set out in Section 3 of the *Independent Audit Post Approval Requirements* (2020). At the end of each audit, the auditor is to prepare an independent audit report. The report includes details such as the audit methodology,

audit findings and recommendations and opportunities for improvement. SecureEnergy will review the draft report and provide a response of the audit findings. If the audit findings identifies any non-compliance, the nominated action and completion timing of the action will be provided as part of the response to each non-compliance.

The submission of the independent audit report and SecureEnergy's response to the audit findings will be submitted to the Department no later than two months from the date of the independent audit site inspection.

Corrective and preventative actions will be identified from the audit findings, and the implementation of those actions managed and monitored as per the process outlined in Section 11.

10 Reporting

10.1 Reporting non-compliances

10.1.1 Reporting non-compliances in accordance with the Infrastructure Approval

Non-compliance is defined in Infrastructure Approval as 'an occurrence, set of circumstances or development that is a breach of this approval. The procedure to respond to any non-compliance will be in accordance with condition E7 of the Infrastructure Approval. As such, the Planning Secretary will be notified in writing via the Major Projects website within seven days after Transgrid becomes aware of any non-compliance. SecureEnergy will provided the appropriate details to assist Transgrid. The written notification will include details such as:

- the non-compliance;
- the reasons for the non-compliance (if known); and
- what actions have been taken, or will be taken, to address the non-compliance.

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

10.1.2 Reporting non-compliances in accordance with the EPBC Act

SecureEnergy will notify Transgrid of any event that impacts or has the potential to impact upon protected matters, as defined under the EPBC Act, immediately on becoming aware of the occurrence. Appropriate details will be provided to assist Transgrid in notifying DAWE in accordance with the requirement of the EPBC Act. Transgrid will notify DAWE in writing of any non-compliance with the conditions or commitments made in plans as defined under the EPBC Act Approval.

10.1.3 Other reporting and notification requirements

SecureEnergy is required to prepare and submit various reports to Transgrid and/or the Department and to undertake reporting required under the Infrastructure Approval. A summary of these reports is provided in Table 10.1.

Table 10.1 - Other reporting requirements

No	Report	Requirement	Timing	Responsibility	Recipient
1	Monthly environmental report	For incorporation in project Monthly Reports.	Monthly	SecureEnergy Environmental Manager	Transgrid
2	Incident Report	Provide a written notification within seven days of becoming aware of the incident. Provide a report on the incident within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary.	Incident notification within seven days of becoming aware of the incident. Incident report within 30 days after the incident has occurred.	SecureEnergy/ Transgrid	DPIE
3	Non-compliance notification	Planning Secretary must be notified within 7 days after identifying the noncompliance.	As required	SecureEnergy/ Transgrid	DPIE
4	Independent audit report	As per the reporting requirements in the Independent Audit Post	Within 12 months of the commencement of construction and at six-	SecureEnergy/ Transgrid	DPIE

No	Report	Requirement	Timing	Responsibility	Recipient
		Approval Requirements (2020).	monthly intervals for subsequent reports		
5	Pre-construction dilapidation report	As per condition D37 of the Infrastructure Approval.	Prior to the commencement of construction	SecureEnergy	DPIE
6	Post-construction dilapidation report	As per condition D37 of the Infrastructure Approval.	Within one month of completion of construction or on an annual basis	SecureEnergy	DPIE

11 Non-compliance, non-conformance, corrective and preventative action

A non-compliance is the failure to comply with the requirements of this CEMP, sub-plans and associated documents such as Infrastructure Approval and relative legislations.

A non-conformance is the failure to meet the procedural requirements and processes developed for the project such as work packs and WMS, or internal permits that forms part of the environmental management system.

Where a non-conformance and/or non-compliance has been identified, corrective actions will be developed as required and implemented to address the non-conformance that occurred. While preventative actions will be developed as required and implemented to minimise the potential for recurrence. In the event of a non-conformance the following will occur:

- the nature of the event will be investigated by the Environmental Manager;
- the effectiveness or need for new/additional controls will be reviewed;
- · appropriate preventative and corrective actions will be developed and implemented; and
- the relevant environmental management practices and procedures implemented for the construction will be reviewed and revised.

Corrective and preventative actions may be generated from a number of sources, including but not limited to incidents, audits and management reviews. The actions will be systematically managed in accordance with the Clough management system to ensure that the required actions are tracked and closed out in a timely manner.

The completion of the required actions will be recorded. The action records will include details on the source of the action (e.g. audit, inspection or other), the action required, target close out date, actual close out date and the person responsible for the action item.

If the actions require changes to the CEMP and sub-plans, the update will occur as described in Section 1.10.

12 Contingency plan

Although the project has been assessed through the environmental impact assessment process and potential impacts identified, unpredicted impacts may occur as the project progresses. In the event that unexpected impacts are identified, the action or cause will be categorised and as required will be managed as:

- an emergency or environmental incident in accordance with Section 8; and/or
- a non-compliance or non-conformance in accordance with Section 11.

Reporting of the unpredicted impacts would be in line with the processes as described in Section 10.

Through the identification of corrective and/or preventative actions through the processes as described in Section 11, the following steps will be considered as relevant:

- a) determine the relevant impact assessment criterion/criteria, below which the impact should be reduced, consistent with the requirements of this CEMP and CEMP sub-plans;
- b) identify options to reduce the unexpected impacts to below the relevant criterion/criteria and appropriate timeframe for implementation;
- c) implement the selected measure(s) to reduce the unexpected impacts; and
- d) identify and implement an appropriate monitoring program to determine the effectiveness of the selected measure(s) to reduce the unexpected impact.

If the above monitoring program identifies that the unexpected impacts have not been reduced to below the nominated criterion/criteria, items b) to d) of the contingency process will be repeated.

This section does not apply to unexpected heritage, biodiversity or contamination finds. These will be managed in accordance with their respective Unexpected Finds Procedure.

13 Documentation

13.1 Records

The Environmental Manager is responsible for maintaining all environmental management documents. Further to Section 4.8, the following records are those that will be generated through delivery of the project:

- · monitoring and inspection records;
- correspondence with public authorities;
- induction and training records;
- site specific records such as those prepared for dewatering and water management, out of hours works, clearing records, unexpected finds etc;
- waste classification records, waste disposal and recycling records for transporting and disposing of waste;
- plans, strategies and reports, and revisions thereof, to ensure compliance with the Infrastructure Approval;
- reports on environmental incidents, environmental non-conformances, and corrective actions;
- · monthly reports and annual reports; and
- audit reports.

All environmental management documents are subject to ongoing review and continual improvement.

13.2 Document and data control

The Environmental Manager will coordinate the preparation, review and distribution, as appropriate, of the environmental documents listed above. During construction, environmental documents will be stored at the main site office and can be accessed on request to the SecureEnergy Environmental Manager.

The *Project Document Control Plan* (45860-IM-PL-G-0003) will be used to control the flow of documents and data within the SecureEnergy teams and between the SecureEnergy and the Transgrid, stakeholders and sub-contractors.

Documents and data that are to be issued and liable to change will be controlled to ensure that they are approved before issue and that the current issue or revision is known to and available to those requiring them. Controlled documents and data will be uniquely identified and will bear a defined revision number recorded on each page of the document.

After a number of changes have been made to a document it will be withdrawn and reissued as a new revision. Data will be issued on a revision basis only. Obsolete documents and data may be kept for contractual or other reasons but will be clearly marked 'superseded'.

Appendix A1 – Legal and other requirement

Legislation

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
Commonwealth Legis	lation				
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	Proposed action	Section 28	A person must not take an action that has, will have or is likely to have a significant impact on any of the matters of national environmental significance without approval.	Yes, the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) aims to protect matters of national environmental significance (MNES) including national heritage places. Following referral of the project to Department of Environment, Agriculture and Water, the project was determined on 25 June 2020 to be a controlled action under section 75 of the EPBC Act, and therefore required further assessment and approval under the Environment Protection and Biodiversity Conservation Act 1999. The referral number is EPBC 2020/8673. The EPBC Act controlling provisions for the proposed actions are: Iisted threatened species and communities (section 18 and 18A). It should be noted that no MNES were identified in the EIS or Amendment Report for the project.	Transgrid
	Bilateral Agreement	Chapter 3 Clause 45	A bilateral agreement is a written agreement between the Commonwealth and a State with the intention of protecting the environment, promoting the conservation and ecologically sustainable use of natural resources, ensuring an efficient, timely and effective process for environmental assessment and approval of actions and to minimising duplication in the environmental assessment and approval process.	EnergyConnect (NSW - Western Section) will be assessed using the bilateral assessment process in accordance Amending Agreement No. 1.	Transgrid
Aboriginal and Torres Strait Islander Heritage Protection	Protection of areas and objects	Section 10	Comply with any declarations relating to the project area	No declarations have been made relating to the project area. In the event that declarations are made, this HMP will be updated if required.	Transgrid SecureEnergy
Act 1984		Section 20	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
		Section 22	Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.	Yes, a Heritage Management Plan has been prepared and will be implemented for the project to outline the compliance requirements for the declared Aboriginal areas or objects within the project footprint.	Transgrid SecureEnergy
Native Title Act 1993	Native Title Land	All	Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.	The project area intersects with the Barkandji Traditional Owners #8 (Part A) native title area (determined). Barkandji Traditional Owners will be included in consultation and archaeological survey for the project.	Transgrid SecureEnergy
New South Wales Leg	jislation				
State Environmental Planning Policy (State and Regional Development) 2011	All	Part 3 Clause 13	Declaration of critical State Significant Infrastructure	On 29 August 2019 the NSW Minister for Planning and Public Spaces declared EnergyConnect critical State significant infrastructure (CSSI) under the State Environmental Planning Policy (State and Regional Development) 2011 on the basis that it is critical to the State for environmental, economic or social reasons. The project may be carried out without development consent under Part 4 of the EP&A Act, however application for approval of the CSSI is required.	Transgrid
Environmental Planning and Assessment Act 1979 (EP&A Act)	All	Section 5.5	A determining authority has the duty to fully consider the environmental impact (including Aboriginal or non-Aboriginal heritage) of an activity and is required to 'take into account the fullest extent possible all matters affecting, or likely to affect the environment' arising from the proposal.	The EnergyConnect (NSW - Western Section) - Environmental Impact Statement was submitted to Department of Planning, Industry and Environment in October 2020 and publicly exhibited between 26 September 2019 and 10 December 2020. On 14 April 2021, the response to submissions was finalised in the EnergyConnect (NSW - Western Section) – Submissions Report. A separate EnergyConnect (NSW - Western Section) – Amendment Report, to document design changes and additional environmental assessment undertaken, was also finalised on 14 April 2021. Transgrid prepared and provided a memorandum titled EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021 and subsequent discussions to DPIE on the 10 August 2021 in response to DPIE requested additional information (EnergyConnect (NSW –	Transgrid

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				Western Section)(SSI-10040) Request for Additional Information).	
		Section 5.19	Approval of the Minister required to carry out critical State significant infrastructure (CSSI). Comply with the conditions of the Infrastructure Approval and generally in accordance with the revised mitigation measures from the Response to DPIE Request for Information.	The project requires approval from the NSW Minister for Planning and Public Spaces under Division 5.2, Part 5 of the EP&A Act. The project was assessed as above. Approval for EnergyConnect (NSW - Western Section) was granted by the Minister for Planning and Public Spaces.	Transgrid
Roads Act 1993	Road usage	Section 138	Road occupancy licences (ROLs) required for any activity likely to impact on traffic flow ROL may be required from TfNSW or Wentworth Shire Council based on road owner	A Road Occupancy Licence (ROL) will be obtained for all activity likely to impact the operational efficiency of the road network, as required by the relevant roads authority. The licence applies to the occupation of the road corridor only and does not grant approval for the works being undertaken.	SecureEnergy
Biodiversity Conservation Act 2016 (BC Act) Flora and Fauna		All	Legislation responsible for the conservation of biodiversity in NSW through the protection of threatened flora and fauna species, populations and Endangered Ecological Communities (EECs). The Biodiversity Conservation Act 2016, together with the Biodiversity Conservation Regulation 2017, established the Biodiversity Offsets Scheme which is outlined below.	The biodiversity impacts of the project have been assessed in accordance with the BC Act, which includes the Biodiversity Assessment Method (BAM) and documented in a Biodiversity Development Assessment Report (BDAR). A Biodiversity Management Plan has been prepared and will be implemented for the project to manage the conservation and protection of threatened flora and fauna.	Transgrid
		Part 6 Division 1 Clause 6.2	This Act, and the <i>Biodiversity Conservation Regulation 2017</i> , outlines the framework for addressing impacts on biodiversity from development and clearing. Biodiversity Offsets Scheme is a framework to avoid, minimise and offset impacts on biodiversity from development and clearing, and to ensure land that is used to offset impacts is secured in-perpetuity.	As part of the assessment under the BC Act, the biodiversity offset credits has been estimated for the project and are outlined in the BDAR. Biodiversity Offset Credits is applicable for clearing on the project. Transgrid as the proponent will retire the full biodiversity offset credit liability of the development.	Transgrid
Fisheries Management Act 1994	Taking or possessing fish or marine vegetation	Section 37	Permit to take and possess fish or marine vegetation	A section 37 permit is required for any activity that involves taking or possessing fish or marine vegetation that would otherwise be unlawful under the <i>Fisheries Management Act 1994</i> including any collecting activities.	Transgrid SecureEnergy

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				There is currently no intention to take and possess fish or marine vegetation, however in the event that this is required, a permit would be developed.	
	Mangroves, seagrasses and marine vegetation	Section 205	Do not harm any mangroves, seagrasses or other marine vegetation on public water land protected by the regulations without a permit.	As the project has been declared as Critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, section 205 of the <i>Fisheries Management Act 1994</i> does not apply.	Not applicable
	Fish passage	Section 219	Do not block fish passage without a permit	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, section 219 of the <i>Fisheries Management Act 1994</i> does not apply.	Not applicable
Biosecurity Act 2015	Weeds and Pest Management	Pest landowners or land managers ha		Biosecurity matters will be discussed with the affected landholders and addressed in project management plans for each property.	Transgrid SecureEnergy
Local Land Services Act 2013	Clearing of native vegetation in regulated rural areas	Part 5A Division 3 Clause 60N and Clause 60O	Clause 60N details the offence to clears native vegetation in a regulated rural area. Clause 60O details the planning approval and authorisation for clearing native vegetation in a regulated rural area.	Yes, as detailed 60O(b) of the Act, approval and authorisation for clearing native vegetation in a regulated rural area is subject to approval of the project under Part 5 of the EP&A Act. Infrastructure Approval will satisfy this compliance requirement.	Transgrid
National Parks and Wildlife Act 1974 (NP&W Act)	Aboriginal places and objects	Part 6 Division 2 Clause 90	This Act provides protection for Aboriginal cultural heritage in NSW, including Aboriginal objects and declared Aboriginal places. Section 86 creates the offence and section 90 creates the requirement to obtain a permit to impact an Aboriginal object, place, land, activity or person.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, section 90 of the <i>National Parks and Wildlife Act 1974</i> , which outlines the requirements for Aboriginal heritage impact permits, does not apply.	Not applicable
		Part 6 Division 1 Clause 89A	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
Native Title Act 1994	Native Title Land	All	Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.	The project area intersects with the Barkandji Traditional Owners #8 (Part A) native title area (determined). Barkandji Traditional Owners will be included in consultation and archaeological survey for the project.	Transgrid SecureEnergy
Rural Fires Act 1997	Bushfire prone land	Section 100B	Bush fire safety authorities	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section100B of <i>Rural Fires Act</i> 1997 does not apply.	Not applicable
Heritage Act 1977	1977 Heritage Section		Do not undertake an activity that will affect a place, building, work, relic, moveable object or precinct which is subject to an Interim Heritage Order or is listed on the State Heritage Register without approval from the Heritage Council.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section 57 (1) of Heritage Act 1977 does not apply.	Not applicable
		Section 139	An excavation permit is required under certain circumstances. A person must not disturb or excavate land with knowledge or reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed; or a person must not disturb or excavate land on where a relic has been discovered or exposed.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section 139 of Heritage Act 1977 does not apply.	Not applicable
		Section 146	A person who is aware or believes that he or she has discovered or located a relic must within a reasonable time notify the Heritage Council of the location of the relic, unless he or she believes on reasonable grounds that the Heritage Council is aware of the location of the relic, and within the period required by the Heritage Council, furnish the Heritage Council with such information concerning the relic as the Heritage Council may reasonably require.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy
Water Management Act 2000 (WM Act)	Water access licence	Section 60A	Do not take water from a water source (a lake, river or estuary or place where water occurs naturally on or below the surface of the ground	Yes, the WM Act applies to areas of New South Wales that have a water sharing plan. The project area is subject to the following water sharing plans:	SecureEnergy

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
			and includes coastal waters) without an access licence.	 NSW Murray Darling Basin Fractured Rock Groundwater Sources 2011, Lachlan Fold Belt Murray Darling Basin Groundwater Source; and 	
				Darling Alluvial Groundwater Sources – including unconfined aquifers with high connectivity to the Darling River	
				NSW Murray Darling Porous Rock Groundwater Sources – including remaining unconfined, semiconfined and confined aquifers.	
				Section 60A of the WM Act requires that a water access licence (WAL) be obtained to extract water from a water source.	
				Section 21 and Schedule 4 of the Water Management (General) Regulation 2018 does however provide exemptions for the requirement to obtain water access licences. Relevant exemptions from Part 1 of Schedule 4 are detailed below:	
				clause 7 provides an exemption for water taken in the course of certain aquifer interference activities (in relation to taking up to 3 ML of groundwater from a groundwater source); and	
				clause 17A provides exemption for the taking of groundwater for excavation works where they are a holder of a water supply work authority in relation to taking of more than 3 ML of groundwater.	
				Any other water required for construction purposes would however require a water access licence. This includes extraction for:	
				 interception activities (i.e. intercepted groundwater during piling); 	
				potable uses for human consumption associated with the accommodation camp.	
	Impacts to water supply work and water use	Section 89 Section 90 Section 91	Under Section 89, a water use approval confers a right on its holder to use water for a particular purpose at a particular location. Under Section 90, approval is required for the authorisation to construct and use a specified water supply work such as pumps,	Section 5.23 of the EP&A Act provides that water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water	SecureEnergy

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
	Activity approvals		bores, spear points or wells at a specified location, drainage work or flood work.	Management Act do not apply to state significant infrastructure.	
			Under Section 91, there are two kinds of activity approvals, controlled activity approvals and aquifer interference approvals. A controlled activity approval is required for carrying out a specified controlled activity at a specified location in, on or under waterfront land. An aquifer interference approval is required for carrying out one or more specified aquifer interference activities at a specified location, or in a specified area.	An activity approval is therefore not required, however an aquifer interference licence may be required when an activity involves any of the following: a) the penetration of an aquifer, b) the interference with water in an aquifer, c) the obstruction of the flow of water in an aquifer, d) the taking of water from an aquifer in the course of carrying out mining, or any other activity prescribed by the regulations, e) the disposal of water taken from an aquifer as referred to in paragraph (d). However, an aquifer interference licence is not required if an activity ensures that no more than minimal harm will be done. Stated under Section 3.3 of the NSW Aquifer Interference Policy, there are a number of activities that are considered as having a minimal impact on water dependent assets which includes monitoring bores and wells that are required by a development consent under Part 4 or an approval under Part 5.1, of the EP&A Act, or required or undertaken as a result of an environmental assessment under Part 5 of EP&A Act. Since the environmental assessment for the project requires the confirmation of groundwater level. An aquifer interference licence is not required.	
Protection of the Environment Operations Act 1997 (POEO Act)	Schedule Activity	Section 47 Section 48	Do not carry out or allow an activity listed in Schedule 1, or carry out work to enable such an activity, unless the premises are licensed by the EPA.	Environment protection licences (EPL) is required for the carrying out of scheduled activities as listed under Schedule 1 of the Act. EPL is likely to be required for the following scheduled activities: 16 Crushing, grinding or separating	SecureEnergy
				An EPL is required if there is a capacity to process more than 150 tonnes of material per day or 30,000 tonnes per year. The need for a crushing or	

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				screening plant will not be known until further geotechnical investigation works have occurred. Should a crushing or screening plant be required and the capacity needed is more than 150 tonnes per day or 30,000 tonnes per year, then an EPL will be obtained.	
	Harming the environment	Section 115 Section 116 Section 117	Do not risk harming the environment by wilfully or negligently: • disposing of waste unlawfully. • causing any substance to leak, spill or otherwise escape (whether or not from a container); or • causing any controlled substance to be emitted into the atmosphere.	Yes, the relevant management measures are included within the Soil and Water Management Plan, Waste Management Plan and Air Quality Management Plan.	SecureEnergy
	Water pollution	Section 120	Do not cause or permit water pollution.	Yes, the relevant management measures have been incorporated within the Soil and Water Management Plan.	SecureEnergy
	Land pollution	Section 142	Do not cause or permit land pollution other than under authority of a licence or regulation (however it is not a land pollution offence to place virgin excavated natural material or lawful pesticides and fertilisers on land, or by placing matter on land that has been notified to the EPA as an unlicensed landfill and which is operated in accordance with the regulations	Yes, the relevant management measures have been incorporated within the Soil and Water Management Plan.	SecureEnergy
	Notification of pollution incidents	Section 148	Notify the EPA immediately of pollution incidents where material harm to the environment is caused or threatened.	Yes, notification requirements are detailed in Section 8 of this CEMP.	SecureEnergy
	Prepare PIRMP if EPL required	Section 153A-F	Requires the holder of an EPL to prepare a pollution incident response management plan (PIRMP)	A PIRMP will be prepared as part of the EPL, if an EPL is required.	SecureEnergy
	Plant maintenance and operation	Section 139	Do not operate plant if it emits noise caused by failure to maintain or operate the plan in a proper and efficient manner.	Yes, the relevant management measures have been incorporated within the Noise and Vibration Management Plan.	SecureEnergy

Legislation/ Aspect Reference Regulations		Requirement	Applicability	Responsibility	
	Control equipment	Section 167	Properly and efficiently maintain and operate any installed pollution control equipment (including monitoring devices).	Yes, the relevant management measures have been incorporated within the Soil and Water Management Plan.	SecureEnergy
Littering		Part 5.6A	Do not litter in a public place or an open private place. Do not litter from a vehicle. Only deposit advertising material in receptacles provided for mail or newspapers or under the door of the premises. Do not deposit advertising material on or in vehicles.	Yes, the relevant management measures have been incorporated within the Waste Management Plan.	SecureEnergy
	Waste and transportation	Section 143	Only transport waste to a facility that can lawfully accept the waste.	Section 143 Notices are to be obtained for waste that is sent to a facility/premise in accordance with the Waste Management Plan.	SecureEnergy
Contaminated Land Management Act 1997 Reporting contamination Section 60 Duty to report contamination.		Duty to report contamination.	Yes, if project activities have caused land contamination, or a landowner becomes aware of land that is contaminated, there is a legal duty under section 60 of the <i>Contaminated Land Management Act 1997</i> to notify the EPA.	SecureEnergy	
Work, Health and Safety Act 2011 Work Health and Safety and Regulation 2011	Health and safety of workers and workplaces	All	This Act provides work health and safety regulations for the management of contaminated waste such as asbestos as well as consideration of health and safety hazards to on-site workers associated with normal construction operations.	Yes, management of contaminated waste including hazardous waste such as asbestos are detailed in the Waste Management Plan. The health and safety of on-site workers' wellbeing are detailed in the HSSE Plan.	SecureEnergy
Protection of the Environment Operations (Waste) Regulation 2005	Waste and transportation	Part 4	Comply with record keeping requirements in relation to the transport of certain types of waste.	Yes, the relevant management measures have been incorporated within the Waste Management Plan.	SecureEnergy
Dangerous Goods (Road and Rail Transport) Act 2008	Hazards and risks	Section 9	Ensure that dangerous goods are transported in a safe manner.	Dangerous goods are required to be transported in a safe manner. Vehicles that transport dangerous goods are required to be licensed. Drivers transporting dangerous goods are required to be licensed. Licences to transport dangerous goods will be obtained if required.	SecureEnergy and SecureEnergy's Subcontractors

Legislation/ Regulations			Requirement	Applicability	Responsibility
Road Transport Act 2013	Provisions concerning road users, road transport and the improvement of road safety	concerning provisions concerning road users, road transport and the improvement of road safety in this jurisdiction To provide the Agreed Reforms within the meaning of the Inter-Governmental		All drivers are required to have a valid driver's licence. All vehicles must be registered with the applicable vehicle registration system.	SecureEnergy and SecureEnergy's Subcontractors
NSW Road Rules 2014	Safe and efficient movement of traffic	All	To consolidate in a single instrument the road rules that are applicable in New South Wales. To provide for road rules that are based on the Australian Road Rules so as to ensure that the road rules applicable in this State are substantially uniform with road rules applicable elsewhere in Australia, To provide for other road rules to be observed in this State in relation to matters that are not otherwise dealt with in the Australian Road Rules	Support the objectives of the legislation by ensuring mitigation recommendations are aligned with the Road Rules.	SecureEnergy

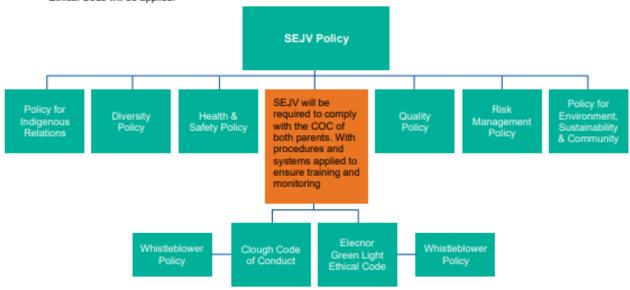
Appendix A2 – Policy for Environment, Sustainability and Community



SecureEnergy Policy Model

SecureEnergy JV (ABN 56 282 382 697), is a joint Venture between Clough Projects Australia Pty Ltd (ABN 26 109 444 215) and Green Light Contractors Pty Ltd (ACN 168 435 658) commonly referred to as "SEJV". SEJV has been initially formed to deliver the Project Energy Connect (PEC) with a view that SEJV will become a viable delivery vehicle that will service substation and transmission network sector projects over the coming years.

It is agreed within the Joint Venture Deed that SEJV will adopt and use Clough's Management Systems (CMS). As a result, SEJV will adopt the Clough Policies that inform these systems as amended from time to time. The exception to this is Clough's Code of Conduct policy. In this instance it is proposed that both Clough's Code of Conduct and Elecnor's Ethical Code will be applied.



John Galvin SteerCo Member - Clough SecureEnergy JV Date 10/02/2021

Faul Farris

Paul Farris SteerCo Member - Clough SecureEnergy JV Date Feb 15, 2021 Carlos Fernandino
SteerCo Member - Elecnor
SecureEnergy JV
DateFeb 25, 2021



Samuel Basanta SteerCo Member - Elecnor SecureEnergy JV Date Feb 16, 2021

All personal information obtained by SecureEnergy Joint Venture during the implementation of this policy will be controlled in accordance with the Clough Policy for Privacy and the Privacy Amendment (Private Sector) Act 2000.

Document No.

Rev No.



Policy for Environment, Sustainability & Community

Clough strives to deliver environmentally sustainable outcomes for energy, materials and water, during all stages of its operations. Clough values sustainable development and believes respect for the environment and the community in which it operates is fundamental to business success.

Clough ensures human, financial and technological resources are provided for the active management and maintenance of the Clough Management System, aligned with the requirements of AS/NZS ISO 14001:2004 to drive continual improvement.

At Clough employees and contractors show their commitment to minimising environment and social impacts and promoting sustainable development by:

- Sharing a belief in a culture of zero harm where harm to people or the environment is unacceptable;
- · Stopping work where an activity could harm the environment or community;
- Planning and performing activities to achieve zero harm outcomes; and
- Understanding their roles, responsibilities and behaviours expected of them.

Clough engages with clients, partners, stakeholders and communities to understand key environmental aspects, potential impacts and support the development of sustainable solutions.

PRINCIPLES:

Wherever Clough operates the following principles apply to promote sustainable development, in all its operating environments:

- Personal Responsibility Individuals take personal responsibility to comply with relevant laws and regulations and apply
 responsible standards as detailed in the Clough Management System where laws do not exist.
- Social Responsibility Clough respects the traditional rights of indigenous peoples and values cultural heritage in the areas we work
- Accountability Clough holds all levels in our organisation accountable for compliance with regular monitoring, reviewing and reporting on our progress against our targets that promote efficient use of resources.
- Risk Management Clough identifies, assesses and manages risks to the environment and our host communities.
- Learning Culture Clough maintains regular, transparent and effective communication with all employees, stakeholders and communities affected by its activities and improves the livelihoods of the communities in which we operate through local employment and training opportunities.
- One Consistent Approach Design and construct to efficiently use energy and raw materials, minimise waste, reduce and prevent pollution.

The Chief Executive Officer of Clough Limited is accountable to the Board of Directors for ensuring that this Policy is implemented throughout Clough's operation

Clough undertakes to communicate this policy to all persons working for or on its behalf and to the public as required. The policy will be reviewed every three years to maintain relevance to Clough business activities.

Peter Bennett

Chief Executive Officer & Managing Director Clough Limited November 2018

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CORP-GOV-POL-G-0014 Rev No.



Appendix A3 – Environmental Aspect a	nd Impact Register
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No.	Activity	Environmental category	Impact/Risk	Aspect/Cause	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
1	Earthworks Vegetation clearing	Heritage	Damage to heritage items, including culturally significant sites, artefacts and heritage values	Clearing outside the project footprint, plant operation and excavation outside project footprint, vibrations from plant operation and transport impacts exceed those assessed and cause structural damage to sensitive items.	Unapproved impacts to heritage items Loss of items of cultural significance Impacts to relationships with traditional owners Potential regulatory action from agencies Project delays Financial penalties Reputational impacts	Major	Almost certain	23 - Very High	 Sensitive Area Plans (SAPs) to include heritage items Noise and Vibration Management Plan Unexpected Heritage Find Procedure Physical demarcation of identified heritage locations 	Major	Unlikely	14 – Moderate	SecureEnergy
2	Vegetation clearing	Biodiversity	Injury/mortality of fauna	Removal of occupied habitat, including hollow bearing trees, shrubs, nests, ground cover, rocks.	Impacts to fauna Reputational impacts Potential regulatory action from agencies	Moderate	Possible	13 - Moderate	 Biodiversity Management Plan Pre-clearing procedure Unexpected threatened species find procedure Fauna handling procedure Use of fauna spotters/handlers 	Moderate	Unlikely	12 – Moderate	Transgrid and SecureEnergy
3	Vegetation clearing	Bushfire	Ignition of bushfire.	Sparks from machinery ignites combustible vegetation and fire gets out of control.	Significant impact to local environment through bushfire Potential destruction of project infrastructure and equipment Potential for fatality/injury to personnel and members of the public Damage to public property and adjacent properties Loss of biodiversity Project delays Significant reputational impact Potential regulatory actions from agencies Financial penalties	Catastrophic	Likely	24 – Very High	 Bushfire Management Plan FRACM Hot Works permits 	Catastrophic	Unlikely	21 – High	SecureEnergy
4	Earthworks Vegetation clearing	Biosecurity	Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines.	Vehicular movements from disturbed and contaminated areas into undisturbed areas within the project area.	Impact to biodiversity in exceedance of the approved Project Spread of weeds/impacts to native vegetation Long term maintenance requirements	Major	Possible	19 – High	 Biosecurity Management Plan Weed and seed inspections Hygiene inspections of vehicle prior to accessing site Washdown bays 	Major	Unlikely	14 – Moderate	Transgrid and SecureEnergy
5	Earthworks Vegetation clearing	Biodiversity	Removal of vegetation/habitat not permitted to be impacted by the project approval	Vegetation clearing outside of project boundary.	 Unauthorised impact to flora Project delays Financial penalties Reputational impacts 	Major	Almost certain	23 - Very High	 Biodiversity Management Plan Set-up exclusion zones and defined clearing limits and no-go zones Sensitive Area Plans (SAPs) Unexpected biodiversity find procedure Clearing and land disturbance Permits Clearing register 	Moderate	Unlikely	12 – Moderate	Transgrid and SecureEnergy
6	Earthworks Vegetation clearing	Surface water	Contamination of surface water. Reduction in water quality. Dispersion of contaminants	Newly exposed sediment and topsoil carried into catchments and watercourses during rainfall events.	 Water pollution Loss of topsoil Impacts to aquatic habitat and fauna Potential regulatory action from agencies Financial penalties Reputational impacts 	Major	Possible	19 – High	 Soil and Water Management Plan Surface Water Monitoring Program Erosion and Sediment Control Strategy and PESCPs Clean water diversions Process and intercepted water management Discharge permit Sediment basins and water treatment 	Major	Unlikely	14 – Moderate	SecureEnergy

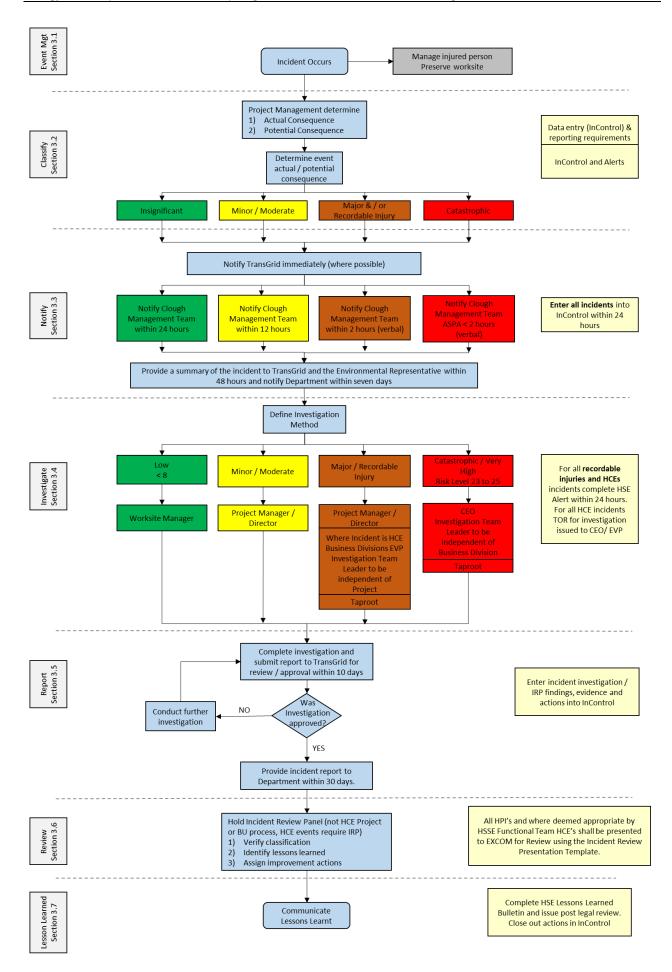
No.	Activity	Environmental category	Impact/Risk	Aspect/Cause	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
7	Earthworks Vegetation clearing	Biodiversity	Fauna disturbance/ relocation	Construction activities in fauna habitats causes fauna to relocate away from area.	 Reduction in localised population of fauna including threatened species Adverse fauna monitoring impacts 	Minor	Likely	11 - Moderate	Biodiversity Management Plan Sensitive Area Plans (SAPs) to included fauna habitats of significance Unexpected biodiversity find procedure	Minor	Possible	10 - Moderate	Transgrid and SecureEnergy
8	Earthworks Vegetation clearing	Noise and vibration	Increased noise and vibration levels at sensitive receivers	Noise levels from construction activities and transport of materials, equipment and personnel exceeds the levels assessed in the Project approval. The project site is remote from sensitive receivers, noise impacts are more likely an issue along the access route through local towns.	Sleep disturbance at sensitive receiver locations Loss of support from local community	Moderate	Almost certain	18 – High	 Noise and Vibration Management Plan Traffic and Transport Management Plan Out of Hours Work Procedure Out of Hours Work Permit Noise monitoring record Vibration monitoring record 	Moderate	Rare	7 – Low	SecureEnergy
9	Earthworks Vegetation clearing	Air Quality	Visible dust plumes and deposition of dust on surfaces, impacts to amenity, dust generation from exposing of topsoil and sub soil through vegetation removal.	Exposed sediment and stockpiled of fine material become airborne in strong winds and carried to other areas.	Excessive dust emission/deposition in surrounding environment Air quality impacts exceed the approved project levels	Moderate	Almost certain	18 – High	 Air Quality Management Plan Implement dust-suppression through use of water cart Rehabilitation/stabilisation of cleared areas where possible 	Moderate	Unlikely	12 – Moderate	SecureEnergy
10	Earthworks Vegetation clearing	Waste	Excess use of natural resources and energy leading to production of greenhouse gases.	Unnecessary operation/idling of vehicles, machinery and plant.	Excessive consumption of diesel and other resources Unnecessary production of greenhouse gases	Minor	Possible	10 - Moderate	Training/instruction to on-site staff, machinery and plant operators to shut down vehicles and equipment when not in use	Minor	Rare	5 – Low	SecureEnergy
11	Earthworks	Biodiversity	Impacts on vegetation/habitat beyond the project boundary.	Improper stockpiling of excavated material and engineered fill.	Unapproved impacts beyond project boundary Potential regulatory action from agencies Project delays Financial penalties Reputational impacts	Major	Possible	19 – High	Biodiversity Management Plan Utilisation of allocated stockpile areas Stockpiling procedure Training for all contractors	Moderate	Rare	7 - Low	Transgrid and SecureEnergy
12	Earthworks	Landform	Loss and/or degradation of topsoils and subsoils.	Exposed sediment carried into catchments and watercourses during rainfall events due to lack of controls or inadequately installed controls.	 Adverse water quality impacts Loss of amenity Potential regulatory action from agencies Reputational impacts 	Moderate	Likely	17 – High	 Soil and Water Management Plan Water Quality Monitoring Program Erosion and Sediment Control Strategy and PESCPs Clean water diversions Process and intercepted water management Sediment basins and water treatment (as required) 	Moderate	Unlikely	12 – Moderate	SecureEnergy

No.	Activity	Environmental category	Impact/Risk	Aspect/Cause	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
13	Transport of materials, equipment and personnel	Biodiversity	Frequent injury/mortality of protected fauna	Driving vehicles on access roads during times of high fauna activity. Excessive speed on access roads. Inattention of drivers on potential for fauna impacts.	 Trigger EPBC Act thresholds for impacts on Commonwealth listed species, Potential regulatory action from agencies Financial penalties Reputational impacts Personal injury due to collision with larger fauna including kangaroos and horses. 	Major	Possible	19 – High	 Biodiversity Management Plan Site inductions Traffic and Transport Management Plan 	Moderate	Unlikely	12 – Moderate	Transgrid and SecureEnergy
14	Transport of materials, equipment and personnel	Biosecurity	Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines.	Vehicular movements from disturbed and contaminated areas into undisturbed areas within the project area.	Impact to biodiversity in exceedance of the approved Project Spread of weeds/impacts to native vegetation Long term maintenance requirements	Major	Possible	19 – High	 Biodiversity Management Plan Biosecurity Plan Site inductions Weed and seed inspections Hygiene inspections of vehicle prior to accessing site 	Major	Unlikely	14 – Moderate	Transgrid and SecureEnergy
15	Transport of materials, equipment and personnel	Surface water	Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	Vehicular spills along access road or within Project compounds.	 Hydrocarbon pollution Potential regulatory action from agencies Financial penalties Reputational impacts 	Major	Possible	19 – High	 Soil and Water Management Plan Spill Response Procedure 	Moderate	Unlikely	12 – Moderate	SecureEnergy
16	Transport of materials, equipment and personnel	Air Quality	Visible dust plumes and deposition of dust on surfaces.	Transportation vehicles movements cause dust particle to become airborne and carried in wind to other areas.	 Excessive dust emission/deposition in surrounding environment Air quality impacts exceed the approved project levels Adverse biodiversity impacts Reputational impacts 	Moderate	Possible	13 - Moderate	 Air Quality Management Plan Implement dust-suppression through use of water cart Cover all loads during transportation 	Moderate	Unlikely	12 – Moderate	SecureEnergy
17	Transport of materials, equipment and personnel	Waste	Excess use of natural resources and energy.	Materials shipped from distant locations, excessive personal vehicle usage, repeated movements back and forth from site.	Unnecessary production of greenhouse gases Impacts of the project exceed those assessed in the EIS	Moderate	Likely	17 – High	Traffic and Transport Management Plan	Moderate	Unlikely	12 – Moderate	SecureEnergy
18	Transport of materials, equipment and personnel	Traffic and Transport	Roadworks on local roads blocking or excessively delaying traffic movements and thoroughfare.	Increased traffic volumes and congestion, increased road noise, degradation of roadways, traffic delays. Heavy and light vehicles moving in convoys through local towns to the project site.	 Traffic delays on local and regional roads Increased road safety hazard Adverse reputational impacts Increased noise and air quality impacts 	Moderate	Likely	17 – High	 Traffic and Transport Management Plan Traffic Control Plans Engagement with community to manage expectations Community Communication Strategy Manage timing of oversize/ overmass (OSOM) movements in accordance with TfNSW requirements 	Minor	Unlikely	6 – Low	SecureEnergy
19	Stockpile/ spoil emplacement	Biodiversity	Introduction and spread of weeds, pests and pathogens causing native/threatened species population declines.	Disturbance of natural areas and storage of spoil provides opportunity for weeds to establish and spread beyond the project area.	Impact to biodiversity in exceedance of the approved Project Spread of weeds/impacts to native vegetation Long term maintenance requirements	Major	Possible	19 – High	 Biodiversity Management Plan Training for all contractors 	Major	Unlikely	14 – Moderate	Transgrid and SecureEnergy

No.	Activity	Environmental category	Impact/Risk	Aspect/Cause	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
20	Stockpile/ spoil emplacement	Surface Water	Erosion and sedimentation. Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	Runoff from spoil stockpiles causes contaminated/pollut ed stormwater discharge into watercourses due to lack of controls or inadequately installed controls.	 Adverse water quality impacts Loss of amenity Potential regulatory action from agencies Reputational impacts 	Major	Possible	19 – High	 Soil and Water Management Plan Erosion and Sediment Control Strategy and PESCPs 	Major	Unlikely	14 – Moderate	SecureEnergy
21	Storage of hazardous materials	Surface water	Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	Spill of stored hazardous material escaping containment into waterways.	 Hydrocarbon pollution Potential regulatory action from agencies Financial penalties Reputational impacts 	Major	Possible	19 – High	 Soil and Water Management Plan Bunded areas for storage of fuels and oils 	Major	Unlikely	14 – Moderate	SecureEnergy
22	Storage of hazardous materials	Groundwater	Contamination of groundwater.	Spill or leaks of stored hazardous material dispersing into ground water.	Potential for irreparable damage to groundwater quality Long term impacts to groundwater dependent species or ecosystems	Major	Unlikely	14 – Moderate	 Soil and Water Management Plan Bunded areas for storage of fuels and oils 	Moderate	Rare	7 - Low	SecureEnergy
23	Rock crushing/ screening	Noise and vibration	Increased noise and vibration levels at sensitive receivers.	Rock crushing and screening activities situated too close to sensitive receivers.	Sleep disturbance at sensitive receiver locations Loss of support from local community	Moderate	Unlikely	12 – Moderate	Noise and Vibration Management Plan Management of operational hours and intensity level	Moderate	Rare	7 - Low	SecureEnergy
24	Rock crushing/ screening	Air Quality	Increased dust emissions.	Rock crushing and screening activities not implementing adequate dust suppression mitigation.	Excessive dust emission/deposition in surrounding environment Air quality impacts exceed the approved project levels Adverse biodiversity impacts	Major	Possible	19 – High	 Air Quality Management Plan Weather monitoring prior to operation Use of covers and water spray 	Minor	Unlikely	6 – Low	SecureEnergy
25	Storage/ disposal of hazardous materials	Waste	Contamination of soil and water, unlawful disposal of waste.	Inadequate storage of hazardous materials, inadequate spill management practices, improper disposal practices.	 Contamination of soil and water in sensitive environment Potential regulatory action from agencies Financial penalties Loss of community support Reputational impacts 	Major	Possible	19 – High	 Waste Management Plan Use of licensed disposal contractors Appropriate bunded storage of hazardous materials 	Major	Unlikely	14 – Moderate	SecureEnergy
26	Operation of accommodati on camp	Waste	Excess use of natural resources and energy.	Inefficient use of resources within the accommodation camp.	Excessive use of resources such as water and electricity	Minor	Likely	11 - Moderate	Energy efficient design of site facilities	Minor	Unlikely	6 – Low	SecureEnergy
27	Operation of accommodati on camp	Waste	Odour impacts, contamination of soil and water in sensitive environment, excess waste sent to landfill.	Inadequate management of camp waste including sewerage and mixed waste.	 Unlawful disposal of waste Excess waste generation Contamination of waste streams Contamination of soil and water Potential regulatory action from agencies 	Moderate	Possible	13 - Moderate	 Waste Management Plan Use of licensed waste disposal contractors Waste tracking and register of waste disposal 	Major	Unlikely	14 – Moderate	SecureEnergy
28	Operation of accommodati on camp	Surface water	Contamination of surface water. Reduction in water quality. Dispersion of contaminants.	Leak from the wastewater treatment plant into the receiving environment	 Environmental contamination Potential regulatory action from agencies Financial penalties Reputational impacts 	Moderate	Likely	17 – High	Soil and Water Management Plan Wastewater treatment plant to be self-bunded	Minor	Unlikely	6 – Low	SecureEnergy

No.	Activity	Environmental category	Impact/Risk	Aspect/Cause	Possible Outcome	Consequence	Likelihood	Initial Risk Rating	Risk Management Measures (DRAFT)	Consequence	Likelihood	Residual Risk Rating	Risk Owner
29	Hot works and plant operations	Bushfire	Ignition of bushfire.	Sparks from machinery or hot work activities ignites combustible vegetation and fire gets out of control.	Significant impact to local environment through bushfire Potential destruction of project infrastructure and equipment Potential for fatality/injury to personnel and members of the public Damage to public property and adjacent properties Loss of biodiversity Project delays Significant reputational impact Potential regulatory actions from agencies Financial penalties	Catastrophic	Likely	24 – Very High	 Bushfire Management Plan FRACM Hot Works Permits 	Catastrophic	Unlikely	15 – Moderate	SecureEnergy
30	Inflow of workforce to local area	Socio economic	Business impacts, increased housing demand.	Workforce size relocating to local area.	Housing rental/purchase prices increase due to increased demand Local services struggle to meet demands Loss of community support for the project	Minor	Possible	10 - Moderate	Establishment of construction camps to provide accommodation for workforce Encourage personnel to purchase local produce and use local business to stimulate positive economic growth in the locality	Minor	Unlikely	6 – Low	SecureEnergy
31	Working in bushfire prone areas	Bushfire	Ignition of bushfire.	Siting of temporary infrastructure and personnel in bushfire prone areas without appropriate bushfire mitigation in place.	Damage to construction site, works and accommodation camps Project delays Safety impacts	Moderate	Possible	13 - Moderate	 Pre-position firefighting equipment Safety and emergency systems and procedures Implement preparatory actions of Bushfire Management Plan 	Minor	Unlikely	6 – Low	SecureEnergy

Appendix A4 – Incident, Notification and Investigation Procedure Flowchart



Appendix A5 – Management measures for unassigned conditions of the Infrastructure Approval and RMMs

ID	Management measures	When to implement	Responsibility	Reference
MM1	Permanent engineering batters and water management measures will be designed to integrate with the existing landforms and natural features.	Detailed design	Design Manager	RMM LV3
MM2	 Lighting at construction compound and accommodation camps will be designed: to minimise off-site lighting impacts to sensitive receivers; include the use of low intensity lighting where practicable, except where required for safety or emergency purposes; generally does not emit light above the horizon, except where required for safety or emergency purposes; and generally in accordance with AS4282-2019 Control of the obtrusive effects of outdoor lighting. 	Detailed design	Supervisor	RMM LV4 Condition D41
ММ3	The project will be designed in accordance with <i>Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz – 100 kHz) (International Commission on Non-Ionizing Radiation Protection</i> and the EMF guidelines of set out in Table 19-2 of the EIS where practicable and feasible, otherwise in line with Transgrid's Transmission Line Design Manual – Major New Build.	Detailed design	Design Manager	RMM HR1 Condition D45
MM4	The storage, handling, and transport of dangerous goods will be undertaken in accordance with: • the relevant Australian Standards and guidelines, particularly: - AS1940 The storage and handling of flammable and combustible liquids; - AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code; and - the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Construction	Supervisor, Environmental Manager, HSSE	Condition D44
MM5	Works to public infrastructure will be undertaken, in consultation with the applicable public authority or service provider, in the following events: • where any public infrastructure that is damaged by the project; and • where any public infrastructure needs to be relocated as a result of the project. Public infrastructure works does not include any damage to roads caused from general road usage.	Construction	Supervisor	Condition A8
MM6	The Proponent will 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 BCA; and where the BCA is not applicable, to the relevant Australian Standard.	Construction	Supervisor	Condition A10
MM7	Advertisement signs, logos and other off-site visual materials related to the project will be avoided or minimised to reduce visual impacts, where reasonable and practicable, except where required for site identification, or traffic and haulage purposes, or safety purposes.	Construction	Supervisor, Environmental Manager	Condition D42

Appendix A6 – Condi	tions of the Infrasti	ructure Approval a	ind Revised	Mitigation
Measures				

Table A6. 1 - Conditions of the Infrastructure Approval and reference document

Condition no.	Condition requirement	Document reference
	PART A – ADMINISTRATIVE CONDITIONS	
	Obligation to Minimise Harm to the Environment	
A1	In meeting the specific performance measures and criteria of this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation or decommissioning of the development.	Construction Environmental Management Plan - Appendix B
	Terms of Approval	
A2	The development may only be carried out: a) in compliance with the conditions of this approval; b) in accordance with all written directions of the Planning Secretary; c) generally in accordance with the EIS; and d) generally in accordance with the Development Layout in Appendix 1.	Construction Environmental Management Plan - Section 1.11
А3	The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this approval; b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and c) the implementation of any actions or measures contained in these documents.	Construction Environmental Management Plan – Section 1.7
A4	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Construction Environmental Management Plan – Section 1.11
A5	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under condition E6.	Construction Environmental Management Plan - Section 1.7
	Lapse of Approval	
A6	This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.	Construction Environmental Management Plan – Section 1.2

Condition no.	Condition requirement	Document reference
	Evidence of Consultation	
A7	Where conditions of this approval require consultation with an identified party, the Proponent must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved.	Construction Environmental Management Plan – Section 1.6
	Protection of Public Infrastructure	
A8	 Unless the Proponent and the applicable authority agree otherwise, the Proponent must: a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable public authority or service provider responsible for that public infrastructure; b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This condition does not apply to any damage to roads caused as a result of general road usage which is expressly provided for in the conditions of this approval. 	Construction Environmental Management Plan – Appendix A5
	Demolition	
A9	The Proponent must ensure that all demolition work on site is carried out in accordance with AS 2601-2001: The Demolition of Structures (Standards Australia, 2001)	Not applicable to Stage 1. Stage 1 works does not include demolition works.
	Structural Adequacy	
A10	The Proponent 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 BCA; and where the BCA is not applicable, to the relevant Australian Standard. Notes: Under Part 6 of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the development. Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Construction Environmental Management Plan – Appendix A5
	Compliance	
A11	The Proponent must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this approval relevant to activities they carry out in respect of the development.	Construction Environmental

Condition no.	Condition requirement	Document reference
		Management Plan – Section 6.1
	Operation of Plant and Equipment	
A12	All plant and equipment used on site, or in connection with the development, must be: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Appendix B2 Noise and Vibration Management Plan
	Applicability of Guidelines	
A13	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.	Construction Environmental Management Plan – Section 3.4
A14	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Construction Environmental Management Plan – Section 3.4
	Community Communication Strategy	
A15	Prior to the commencement of construction, the Proponent must prepare a Community Communication Strategy to provide mechanisms to facilitate communication between the Proponent and the community (including adjoining affected landowners) during construction.	Community Communication Strategy
	The Community Communication Strategy must:	
	a) identify landowners for potentially impacted receivers;	
	b) ensure that the landowners identified in (a) are consulted during construction;c) set out procedures and mechanisms for the regular distribution of information to the wider community;	
	d) establish a public liaison officer(s) to engage with the local community; and	
	e) set out procedures and mechanisms:	
	through which the community can discuss or provide feedback to the Proponent;	
	 through which the Proponent will respond to enquiries or feedback from the community; and 	
	 to resolve any issues and mediate any disputes that may arise in relation to construction of the development. 	
	The Proponent must implement the Community Communication Strategy for the duration of construction.	
	Environmental Representative	
A16	Prior to commencing the development, an Environmental Representative (ER) must be approved by the Planning Secretary and engaged by the Proponent.	Construction Environmental

Condition no.	Condition requirement	Document reference
		Management Plan – Section 4.9.2
A17	The Planning Secretary's approval of an ER must be sought no later than one (1) week before commencing the development.	Construction Environmental Management Plan – Section 4.9.2
A18	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in condition A2, and is independent from the design and construction of the development. The ER must meet only the requirements set out in section 2.2, 2.3,2.4 and 3 in the <i>Environmental Representative Protocol</i> (Department of Planning and Environment, October 2018).	Construction Environmental Management Plan – Section 4.9.2
A19	From commencing the development, until commencing operation, or as agreed with the Planning Secretary, the approved ER must: a) review the documents identified in conditions A15, B1, B2, D3, D10, D11, D29, D37 D47, D52 and D53, and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Department for information or are not required to be submitted to the Department); b) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints; and c) consider any minor amendments to be made to the plans / strategies in conditions A15, D11, D52, D53, E3, E4, E5, E6, E7 that involve updating or are of an administrative nature and do not increase impacts to nearby sensitive receivers, and ensure they are consistent with the terms of this approval and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval.	Construction Environmental Management Plan – Section 4.9.2
A20	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A19, as well as the complaints register for any complaints received (on the day they are received).	Construction Environmental Management Plan – Section 1.10 and 7.2

ction Environmental Ma	onstruction, a Construction Environmental Management mitments and mitigation measures specified in the EIS v		Construction Environmental Management Plan Traffic and Transport Management Plan Noise and Vibration Management Plan Biodiversity Management Plan Soil and Water Management Plan
he commencement of co ormance outcomes, comm	onstruction, a Construction Environmental Management mitments and mitigation measures specified in the EIS v		Environmental Management Plan Traffic and Transport Management Plan Noise and Vibration Management Plan Biodiversity Management Plan Soil and Water Management Plan
ormance outcomes, comr	mitments and mitigation measures specified in the EIS v		Environmental Management Plan Traffic and Transport Management Plan Noise and Vibration Management Plan Biodiversity Management Plan Soil and Water Management Plan
			Heritage Management Plan
wing CEMP Sub-plans made 1. CEMP Sub-plans Required CEMP Sub-plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan	nment agencies identified for each CEMP Sub-	Construction Environmental Management Plan Appendix B1 Traffic and Transport Management
loise and Vibration	Council		Plan
Soil and Water	DPIE Water Council		Appendix B2 Noise and Vibration Management Plan
iodiversity	BCS Council		Appendix B3 Biodiversity Management Plan
	Heritage NSW Aboriginal stakeholders		Appendix B4 Soil and Water Management Plan Appendix B5 Heritage
leritage	TfNSW		Management Plan
	ge and Transport	ge Heritage NSW Aboriginal stakeholders	ge Heritage NSW Aboriginal stakeholders and Transport TfNSW

Condition no.	Condition requirement	Document reference
B3	Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation must be provided with the relevant CEMP Sub-Plan.	Construction Environmental Management Plan
		Appendix B1 Traffic and Transport Management Plan
		Appendix B2 Noise and Vibration Management Plan
		Appendix B3 Biodiversity Management Plan
		Appendix B4 Soil and Water Management Plan
		Appendix B5 Heritage Management Plan
B4	Any of the CEMP Sub-plans may be submitted along with, or subsequent to, the submission of the CEMP but in any event prior to the commencement of construction.	Construction Environmental Management Plan
		Appendix B1 Traffic and Transport Management Plan
		Appendix B2 Noise and Vibration Management Plan
		Appendix B3 Biodiversity Management Plan
		Appendix B4 Soil and Water Management Plan
		Appendix B5 Heritage Management Plan

Condition no.	Condition requirement	Document reference
B5	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, must be implemented for the duration of construction. Where construction of the development is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been approved by the Planning Secretary	Construction Environmental Management Plan Appendix B1 Traffic and Transport Management Plan Appendix B2 Noise and Vibration Management Plan Appendix B3 Biodiversity Management Plan Appendix B4 Soil and Water Management Plan Appendix B5 Heritage Management Plan
	Management Plan Requirements	
B6	The CEMP and CEMP Sub-plans required under this approval must be prepared by suitably qualified and experienced persons in accordance with relevant guidelines, and include where relevant: a) a summary of relevant background or baseline data; b) details of: (iii) the relevant statutory requirements (including any relevant approval or licence conditions); (iv) any relevant limits or performance measures and criteria; and (v) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; c) any relevant commitments or recommendations identified in the EIS; d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; e) a program to monitor and report on the: (vi) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and (vii) effectiveness of the management measures set out pursuant to paragraph d); f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; g) a program to investigate and implement ways to improve the environmental performance of the development over time; h) a protocol for managing and reporting any:	Construction Environmental Management Plan Appendix B1 Traffic and Transport Management Plan Appendix B2 Noise and Vibration Management Plan Appendix B3 Biodiversity Management Plan Appendix B4 Soil and Water Management Plan Appendix B5 Heritage Management Plan

Condition no.	Condition requirement	Document reference
	 (viii) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion; (ix) complaint; or (x) failure to comply with other statutory requirements; and i) set out the procedures that would be implemented to: (xi) keep the local community and relevant agencies informed about the operation and environmental performance of the development; (xii) receive, handle, respond to, and record complaints; (xiii) resolve any disputes that may arise; (xiv) respond to any non-compliance; (xv) respond to emergencies; and j) a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and k) a protocol for periodic review of the CEMP and associated subplans and programs. 	
	The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	
	PART C – OPERATIONAL ENVIRONMENTAL MANAGEMENT	
	Operational Environmental Management Plan	
C1	An Operational Environmental Management Plan (OEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures made and identified in the EIS will be implemented and achieved during operation. This condition C1) does not apply if condition C2 of this approval applies.	Not applicable to Stage 1. This condition is relevant to the operational phase of the project
C2	An OEMP is not required for the development if the Proponent has an Environmental Management System (EMS) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the EMS: a) the performance outcomes, commitments and mitigation measures, made and identified in the EIS, and specified relevant terms of this approval can be achieved; b) issues identified through ongoing risk analysis can be managed; c) there is a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this approval; d) there is a strategic framework for environmental management of the development; e) the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development is clear; and f) procedures are in place for:	Not applicable to Stage 1. This condition is relevant to the operational phase of the project

Condition no.	Condition requirement	Document reference
	 keeping the local community and relevant agencies informed about the operation and environmental performance of the development; receiving, handling, responding to, and recording complaints; resolving any disputes that may arise; responding to any non-compliance; and responding to emergencies. 	
C3	Prior to the commencement of operations, the OEMP or EMS or equivalent as agreed with the Planning Secretary must be prepared to the satisfaction of Planning Secretary.	Not applicable to Stage 1. This condition is relevant to the operational phase of the project
	PART D - KEY ISSUE CONDITIONS	
	Noise and Vibration	
	Construction Hours	
D1	Road upgrades, construction, demolition, upgrading or decommissioning activities may only be undertaken between: a) 7 am to 6 pm Monday to Friday; b) 8 am to 1 pm Saturdays; and c) at no time on Sundays and NSW public holiday; unless the Planning Secretary agrees otherwise.	Appendix B2 Noise and Vibration Management Plan
D2	The following construction activities may be carried out outside the hours specified in condition D1 above: a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; and c) works carried out in accordance with the hours and noise limits specified in any negotiated agreements with sensitive receivers (owners and occupiers), provided the negotiated agreements are in writing and finalised before the commencement of works.	Appendix B2 Noise and Vibration Management Plan
D3	 An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of works which are outside the hours defined in conditions D1, D2, and D7 The Protocol must be approved by the Planning Secretary before commencing works. The Protocol must: a) be prepared in consultation with Council; b) provide a process for the consideration of out-of-hours works against the relevant noise and vibration criteria, including the determination of low and high-risk activities; c) provide a process for the identification of mitigation measures for potential impacts, including respite periods in consultation with any affected receivers; 	Appendix B2 Noise and Vibration Management Plan Out of Hours Work Protocol

Condition no.	Condition requirement	Document reference
	 d) provide a process for the identification of out-of-hours works undertaken by third parties in the vicinity of the site, and coordination of out-of-hours works with these third parties to achieve respite periods in locations where receivers may be affected by concurrent activities; 	
	e) identify an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where:	
	 low risk activities can be undertaken without the approval of the Planning Secretary and with the approval of the ER; and 	
	 high risk activities that are approved by the Planning Secretary; and 	
	f) identify Department, Council and community notification arrangements for approved out of hours work	
	Construction and Decommissioning	
D4	The Proponent must take all reasonable and feasible steps to minimise the construction, upgrading or decommissioning noise of the development in the locations where the noise is audible to sensitive receivers, including any associated traffic noise.	Appendix B2 Noise and Vibration Management Plan
D5	The Proponent must implement mitigation measures:	Appendix B2 Noise and
	 to ensure that the noise generated by any construction, upgrading or decommissioning activities is managed in accordance with the requirements for construction 'noise affected' management levels established in accordance with <i>Interim Construction Noise</i> Guideline (DECC, 2009); and 	Vibration Management Plan
	b) with the aim of achieving the road traffic noise assessment criteria for residential land uses from NSW Road Noise Policy (DECCW, 2011).	
D6	The Proponent must comply with the following vibration limits:	Appendix B2 Noise and
	a) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure);	Vibration Management
	b) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and	Plan
	 vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage). 	
D7	Blasting may only be carried out on the site between 9 am and 5 pm Monday to Friday and between 9 am to 1 pm on Saturday. No blasting is allowed on Sundays or public holidays.	Not applicable to Stage 1.
		No blasting is proposed for the project.

Condition no.	Condition req	uirement				Document reference
D8	The Proponent Table 2: Blasti		any blasting carri	ed out on the site does not exceed the	criteria in Table 2.	Not applicable to Stage 1.
	Location	Airblast overpressure (dB(Lin Peak))	Ground vibrations(m m/s)	Allowable exceedance		No blasting is proposed for the project.
	Any non-	120	10	0%		
	associated residence	115	5	5% of the total number of blasts or events over the rolling period of 12 months		
	Operation					
D9	operation of the	e development doe	s not exceed 35		suring that the noise generated by the accordance with the procedures in the NSW	Not applicable to Stage 1. This condition is relevant to the operational phase of the project.
D10	Within 12 months of the date of this approval, the Proponent must prepare an Operational Noise Review to confirm noise predictions and control measures that would be implemented for the operation of the development. The Review must: a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary; b) be prepared in consultation with impacted residences; c) identify residences predicted to experience noise levels that exceed 40 dB(A) LAeq,15min at the reasonably most affected point of the residence, determined in accordance with the <i>NSW Noise Policy for Industry</i> (EPA, 2017); d) detail the noise mitigation measures to achieve the noise criteria identified, including the timing of implementation; e) provide evidence of consultation with affected landowners; f) include a consultation strategy to seek feedback from directly affected landowners on the noise mitigation measures; and g) identify procedures for the management of operational noise complaints. The Proponent must implement any identified mitigation measures prior to the commencement of operation.			Not applicable to Stage 1. This condition is relevant to the operational phase of the project		
	Operational N	oise Monitoring				
D11	staged), the Prairies a) undertake	oponent must:	determine whet	her the development is complying with	n of a stage, if the development is to be	Not applicable to Stage 1. This condition is relevant to the operational phase of the project.

Condition no.	Condition requirement	Document reference
D12	The Proponent must undertake further noise monitoring of the development if required by the Planning Secretary.	Not applicable to Stage 1. This condition is relevant to the operational phase of the project.
	Noise and Vibration CEMP Sub-Plan	
D13	 The Noise and Vibration CEMP Sub-Plan required under condition B2 must: a) ensure the requirements in conditions D1 to D12 are complied with; b) include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development; c) include a detailed description of the noise and vibration management system for the development; d) include a protocol for the identification, notification and management of works that exceed the noise management levels; and e) include a monitoring program that evaluates and reports on the effectiveness of the noise and vibration management system. 	Appendix B2 Noise and Vibration Management Plan Out of Hours Work Protocol Community Communication Strategy
	Air Quality	
D14	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and b) minimise the surface disturbance of the site.	Air Quality Management Plan
	Soil and Water	
	Water Supply	
D15	The Proponent must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the development.	Appendix B4 Soil and Water Management Plan
	Erosion and Sedimentation	
D16	The Proponent must: a) minimise erosion and control sediment generation; and b) ensure all land disturbances have appropriate drainage and erosion and sediment controls designed, installed and maintained in accordance with Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) and Managing Urban Stormwater - Soils and Construction Volume 2C Unsealed Roads (DECC, 2008);	Appendix B4 Soil and Water Management Plan Erosion and Sediment Control Strategy

Condition no.	Condition requirement	Document reference
	Pollution of Waters	
D17	Unless otherwise authorised by an EPL, the Proponent must ensure the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Appendix B4 Soil and Water Management Plan
D18	The Proponent must: a) ensure that appropriate components of the concrete batching plants and substation are suitably bunded; and b) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.	Appendix B4 Soil and Water Management Plan
D19	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.	Not applicable to Stage 1 works. Groundwater dewatering activities is not proposed as part of Stage 1 works.
	Riparian Areas	
D20	 The Proponent must ensure: a) all activities on waterfront land are constructed in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (2012), unless DPIE Water agrees otherwise; and b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted. 	Not applicable to Stage 1 works. Waterway crossings activities is not proposed as part of Stage 1 works and the Darling River, Great Darling Anabranch or Murray River are not in the vicinity of Stage 1 disturbance area.
	Flooding	
D21	The Proponent must ensure that the development: a) does not materially alter the flood storage capacity, flows or characteristics in the development area or off-site; and b) is designed, constructed and maintained to reduce impacts on surface water, localised flooding and groundwater at the site, unless otherwise agreed by Council.	Appendix B4 Soil and Water Management Plan Accommodation Camp Management Plan
	Acid Sulfate Soils	
D22	The Proponent must ensure that any construction activities in identified areas of acid sulfate soil risk are undertaken in accordance with the Acid Sulfate Soil Manual (Acid Sulfate Soil Management Advisory Committee, 1998).	Not applicable to Stage 1 works. The Stage 1 disturbance area is not identified as acid sulfate soil risk prone areas

Condition no.	Condition requirement	Document reference
	Salinity	
D23	The Proponent must ensure that any construction activities in identified areas of moderate to high salinity are undertaken in accordance with the Salinity Training Manual (DPI, 2014) and Book 4 Dryland Salinity: Productive use of Saline Land and Water (NSW DECC, 2008).	Appendix B4 Soil and Water Management Plan
	Soil and Water CEMP Sub-Plan	
D24	The Soil and Water CEMP Sub-Plan required under condition B2 must include provisions for: a) ensuring the requirements in conditions D15 to D23 are complied with; b) managing flood risk during construction; c) investigating, assessing and managing contaminated land, soils and groundwater in the development area; d) investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area; and e) managing any unexpected and / or suspected contaminated land, asbestos and unexploded ordinance excavated, disturbed or otherwise discovered during construction.	Appendix B4 Soil and Water Management Plan Unexpected Contamination Finds Procedure
	Biodiversity	
	Restrictions on Clearing and Habitat	
D25	Unless otherwise agreed with the Planning Secretary, the Proponent must: a) ensure that no more than: 19.6 hectares (ha) of BC Act listed Sandhill Pine Woodland in the Riverina, Murray-Darling Depression and NSW Southwestern Slopes bioregions; 0.04 ha of habitat for BC Act listed flora species Acacia acanthoclada (Harrow Wattle); 0.32 ha of habitat for BC Act and EPBC Act listed flora species Atriplex infrequens (A saltbush); 1.51 ha of habitat for BC Act listed flora species Austrostipa nullanulla (A spear-grass); 14 individuals of BC Act listed Santalum murrayanum (Bitter Quandong); and 6.91 ha of habitat for BC Act and EPBC Act listed fauna species Polytelis anthopeplus monarchoides (Regent Parrot) (eastern subspecies); is cleared for the development; and b) minimise: the impacts of the development on hollow-bearing trees; the impacts of the development on threatened bird and bat populations; and the clearing of native vegetation and key habitat.	Appendix B3 Biodiversity Management Plan

Condition no.	Condition requirement	Document reference
	Biodiversity Offsets Package	
D26	Prior to carrying out any development that would impact on biodiversity values, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and to the satisfaction of the Secretary in writing. The Package must include, but not necessarily be limited to:	Appendix B3 Biodiversity Management Plan Biodiversity Offset
	(a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS;	Package
	(b) the cost for each specific biodiversity offset measure, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measure is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW) and the offsets payment calculator that was established as at 29 July 2021);	
	(c) the timing and responsibilities for the implementation and delivery of the measures required in the Package; and	
	(d) confirmation that the biodiversity offset measures will have been implemented and delivered no later than 31 December 2023.	
	Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.	
D27	Prior to carrying out any development that could impact the biodiversity values requiring offset, the Proponent must establish an escrow account and pay into that account \$48 million, in accordance with the Deed of Agreement with the Planning Secretary executed on 13 September 2021. The Proponent must comply with the terms of the Deed.	Not applicable. TransGrid will establish an escrow account prior
	Note: this condition provides security to the Minister for the performance of the Proponent's obligations under this approval in relation to biodiversity offsets and release funds for payment into the Biodiversity Conservation Trust in the event that the biodiversity offsets (either in whole or part) are not delivered in accordance with the Package by the Proponent.	to development.
	Biodiversity CEMP Sub-Plan	
D28	The Biodiversity CEMP Sub-Plan required under condition B2 must include:	Appendix B3 Biodiversity
	a) a description of the measures that would be implemented for:	Management Plan
	 minimising the amount of native vegetation clearing within the approved development footprint; 	Preclearing and Clearing
	 minimising the loss of key fauna habitat, including tree hollows; 	Procedure Fauna Handling
	 minimising the impacts on fauna on site, including undertaking pre-clearance surveys; 	Procedure
	 minimising the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species; 	Soil and Water
	 rehabilitating and revegetating disturbance areas; 	Management Plan
	 protecting native vegetation and key fauna habitat outside the approved disturbance area; 	Emergency Plan
	 maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and revegetation of the site; 	
	 collecting and propagating seed (where relevant); 	
	controlling weeds;	
	controlling erosion; and	
	bushfire management;	
	 details of the Proponent's commitment to make a one off \$150,000 funding contribution targeted at further scientific study into the impacts of electric and magnetic fields on birds in Australia; 	

Condition no.	Condition requirement	Document reference
	c) preparation and implementation of a two year bird impact monitoring program at the commencement of operations; and	
	d) a detailed program to monitor and report on the effectiveness of these measures.	
	Heritage	
D29	Prior to commencing construction, the Proponent must provide an Aboriginal Cultural Heritage Strategy, prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary. The Strategy must:	Appendix B5 Heritage Management Plan
	 a) identify any additional risk zones outside the potential archaeological deposits (PADs) where construction must not commence until subsurface testing in b) and surveys in c) are complete; 	Aboriginal Cultural Heritage Strategy
	b) describe additional subsurface testing that will be undertaken to confirm the significance of the PADs that would be impacted by the final transmission infrastructure design and ancillary facilities in line with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010);	
	c) describe additional Aboriginal heritage surveys that will be undertaken where ground disturbance activities are required outside of the heritage survey area;	
	d) include details of ongoing consultation with the Aboriginal stakeholders, including any written responses and records of any meetings; and	
	e) include an updated Aboriginal cultural heritage assessment report, which:	
	 is based on the findings of the subsurface testing in b) and surveys in c); 	
	 describes any potential additional impacts to heritage items; 	
	 identifies further mitigation measures, including avoidance or salvage; 	
	 includes detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and 	
	 provides an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations. 	
	Avoidance and Salvage	
D30	The Proponent must implement all reasonable and feasible measures to avoid and minimise harm to heritage items and potential archaeological deposits (PADs) identified in the EIS and the Aboriginal Cultural Heritage Strategy required by condition D29, prior to carrying out any development that could harm the items or deposits.	Appendix B5 Heritage Management Plan
D31	The Proponent must ensure the development does not cause any harm to heritage items identified for avoidance in the approved Aboriginal Cultural Heritage Strategy or any Aboriginal heritage items located outside the approved development footprint.	Appendix B5 Heritage Management Plan
D32	Prior to carrying out any activity that could harm heritage items, the Proponent must salvage and relocate all heritage items identified for salvage and relocation in the updated and approved Aboriginal Cultural Heritage Strategy to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010).	Appendix B5 Heritage Management Plan
D33	The Proponent must ensure the development does not cause any harm to heritage items PEC-W-H-1 and PEC-W-SE-H1.	Not applicable to Stage 1 works.
		No works associated with Stage 1 of

Condition no.	Condition requirement	Document reference
		construction will impact PEC-W-H-1 or PECW- SE-H1.
	Heritage CEMP Sub-Plan	
D34	The Heritage CEMP Sub-Plan required under condition B2 must: f) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary; g) include a description of the measures that would be implemented for: • addressing the outcomes of the additional assessment, testing and surveys identified in condition D29; • protecting the heritage items identified in conditions D31 and D33, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved development corridor; • salvaging and relocating the heritage items identified in condition D32; • minimising and managing the impacts of the development on heritage items within the development corridor, including: - a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; • a contingency plan and reporting procedure if: - heritage items outside the approved disturbance area are damaged; - previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered; • 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; and h) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the development.	Appendix B5 Heritage Management Plan Unexpected Heritage Finds Procedure
	Traffic and Transport	
	Designated Heavy and Over-Dimensional Vehicle Routes	
D35	All over-dimensional vehicles associated with the development must only travel to and from the site via the Primary Access Route described in the EIS, as identified in the figure in Appendix 2, unless the Planning Secretary agrees otherwise. Notes: The Proponent is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.	Appendix B1 Traffic and Transport Management Plan

Condition no.	Condition requirement	Document reference
D36	All heavy and light vehicles associated with the development: a) must travel to and from the site via the Primary Access Route described in the EIS, as identified in the figure in Appendix 2; and b) may travel to and from the site via the Secondary Access Routes and Water Supply Routes, subject to the requirements in conditions D37 and D38, to the satisfaction of the relevant roads authority, unless the Planning Secretary agrees otherwise.	Appendix B1 Traffic and Transport Management Plan
	Traffic Strategy	
D37	Prior to commencing construction, the Proponent must prepare a Traffic Strategy, in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary, which:	Traffic Strategy Air Quality Management
	 a) for all access routes: identifies the location and type of any necessary road upgrades (including roads, intersections, crossing points and access points), including consideration of relevant amenity impacts; 	Plan
	 ensures that any road upgrades comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), unless the relevant roads authority agrees otherwise; 	
	 includes a detailed assessment of potential impacts of any necessary road upgrades (such as heritage and biodiversity impacts), including consideration of appropriate mitigation measures; 	
	 identifies whether intersections, crossing points and access points would be permanent or temporary; and 	
	includes measures for notifying, seeking feedback from and addressing the concerns of impacted residents along the routes;	
	b) for Secondary Access Routes and Water Supply Routes:	
	 provides detailed usage of the routes, including maximum daily numbers of heavy and light vehicles and approximate durations of use; 	
	 includes an assessment of dust impacts to any residences along the routes and identifies mitigation measures to minimise any impacts; and 	
	 identifies any residences along the routes that would experience road traffic noise above the relevant assessment criteria from Table 3 in NSW Road Noise Policy (DECCW, 2011) due to project-related traffic and identifies mitigation measures to minimise impacts. 	
D38	Prior to commencing construction, the proponent must implement the road upgrades and the mitigation measures identified in the Traffic Strategy in condition D37, to the satisfaction of the relevant roads authority and the Planning Secretary, respectively.	Traffic Strategy
	Road Maintenance	
D39	The Proponent must:	Appendix B1 Traffic and
	a) undertake an independent dilapidation survey to assess the:	Transport Management Plan
	 existing condition of all local roads on the transport route (including local road crossings) prior to construction, upgrading or decommissioning works; and 	Independent dilapidation survey reports
	 condition of all local roads on the transport route (including local road crossings): 	Survey reports
	 within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority; 	

Condition no.	Condition requirement	Document reference
	 on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority; b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings), if dilapidation surveys identify that the road has been damaged by the development during construction, upgrading or decommissioning works; in consultation with the relevant roads authority, to the satisfaction of the Planning Secretary. 	
	Traffic and Transport CEMP Sub-Plan	
D40	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: a) details of the transport route to be used for all development-related traffic; b) details of the transport route to be used for all development-related traffic; c) details of the measures that would be implemented to: • minimise traffic safety impacts of the development and disruptions to local road users during construction, upgrading or decommissioning works, including: - a description of the proposed dilapidation surveys required by condition D39 of this approval; - a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camps; - temporary traffic controls, including detours and signage; - procedures for stringing cables and transmission lines across roads; - notifying the local community about development-related traffic impacts; - procedures for receiving and addressing complaints from the community about development- related traffic; - minimising potential cumulative traffic impacts with other projects in the area; - minimising potential conflict between development-related traffic and rail services, stock movements and school buses, in consultation with local schools, including preventing queuing on the public road network; - implementing measures to minimise development-related traffic on the public road network outside of standard construction hours; - minimising dirt tracked onto the public road network from development-related traffic; - details of the employee shuttle bus service (if proposed), including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; - encouraging car-pooling or ride sharing by employees; - 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; - ensuring loaded vehicles enter	Appendix B1 Traffic and Transport Management Plan Traffic Strategy Community Communication Strategy Drivers Code of Conduct Flood Response Plan

Condition no.	Condition requirement	Document reference
	 fatigue management. comply with the traffic conditions in this approval; d) include a drivers code of conduct that addresses: travelling speeds; procedures to ensure that drivers to and from the development adhere to the designated over-dimensional and heavy vehicle routes; procedures to ensure that drivers to and from the development implement safe driving practices; and include a detailed program to monitor and report on the effectiveness of these measures and the code of conduct; and a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding. 	
	Visual amenity	
	Visual Impact Mitigation	
D41	Unless the Planning Secretary agrees otherwise, for a period of 2 years from the commencement of operations, the owners of R1489, R2022 and R2023 may ask the Proponent to implement visual impact mitigation measures on their land to minimise the visual impacts of the development on their residence (including its curtilage). Upon receiving such a written request from the owner of these residences, the Proponent must implement appropriate mitigation measures (such as landscaping and vegetation screening) in consultation with the owner. These mitigation measures must be reasonable and feasible, aimed at reducing the visibility of the transmission line and towers from the residence and its curtilage, and commensurate with the level of visual impact on the residence. All agreed mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise. If the Proponent and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution. To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of transmission lines and towers from any other locations on the property other than the residence and its curtilage.	Not applicable to Stage 1. This condition is relevant to from the commencement of the operational phase of the project
	Visual Appearance	
D42	The Proponent must: a) take reasonable steps to minimise the off-site visual impacts of the development; and b) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Construction Environmental Management Plan – Appendix A5
	Lighting	
D43	The Proponent must: a) take all reasonable steps to minimise the off-site lighting impacts of the development; and b) ensure that any external lighting associated with the development:	Construction Environmental Management Plan – Appendix A5

Condition no.	Condition requirement	Document reference
	 is installed as low intensity lighting (except where required for safety or emergency purposes); does not shine above the horizontal; and 	
	 complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting. 	
	Hazard and risk	
	Dangerous Goods	
D44	The Proponent must ensure that the storage, handling, and transport of dangerous goods is undertaken in accordance with the relevant Australian Standards and guidelines, particularly AS1940 The storage and handling of flammable and combustible liquids and AS/NZS 1596:2014 The storage and handling of LP Gas, the Dangerous Goods Code, and the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Construction Environmental Management Plan – Appendix A5
	Electric and Magnetic Fields	
D45	The Proponent must ensure that the design, construction and operation of the development is managed to comply with the applicable electric and magnetic fields (EMF) limits in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) Guidelines for limiting exposure to time-varying electric and magnetic fields (1Hz – 100kHz) (ICNIRP, 2010).	Construction Environmental Management Plan – Appendix A5
	Bushfire safety	
	Operating Conditions	
D46	 The Proponent must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; b) ensure that the development: complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2019</i> (or equivalent) and Standards for Asset Protection Zones; 	Accommodation Camp Management Plan
	 is suitably equipped to respond to any fires on site, including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each of the construction compounds and accommodation camps; 	
	incorporates the recommendations of a fire risk assessment as per TransGrid's design standards;	
	 ensure that buildings within the compounds and accommodation camps comply with Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019; 	
	d) develop procedures to manage potential fires on site, in consultation with the RFS and FRNSW;	
	e) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and	
	 f) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations. 	

Condition no.	Condition requirement	Document reference
	Emergency Plan	
D47	Prior to commencing construction, the Proponent must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the local Fire Control Centre, and provide a copy of the plan to the local Fire Control Centre. The Proponent must keep two copies of the plan on-site in a prominent position adjacent to the site entry point(s) to the Buronga Substation at all times. The plan must:	Emergency Plan
	a) be consistent with:	
	RFS's Planning for Bushfire Protection 2019 (or equivalent); RES's Parallel and Evaluation A Children and Evaluation Plans	
	 RFS's Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; the Fire and Rescue NSW Act 1989; 	
	the Work Health and Safety (WHS) Act 2011;	
	b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	
	c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	
	d) list works that should not be carried out during a total fire ban;	
	e) include availability of fire suppression equipment, access and water;	
	f) include procedures for the storage and maintenance of any flammable materials;	
	g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency;	
	h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);	
	i) include location of hazards (physical, chemical and electrical) that may impact on fire fighting activities and procedures to manage identified hazards during fire fighting activities;	
	 j) include details of the location, management and maintenance of any Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone; 	
	k) include bushfire emergency management planning;	
	I) include details of the how RFS would be notified, and procedures that would be implemented, in the event that:	
	there is a fire on-site or in the vicinity of the site;	
	 there are any activities on site that would have the potential to ignite surrounding vegetation; or 	
	 there are any proposed activities to be carried out during a bushfire danger period that have the potential to ignite surrounding vegetation; and 	
	m) include details on how live transmission infrastructure can be safely isolated in an emergency.	
	Waste	
D48	Waste generated during construction, operation, upgrading and decommissioning must be dealt with in accordance with the following priorities: a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced;	Waste Management Plan

Condition no.	Condition requirement	Document reference
	b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and	
	c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.	
D49	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (Waste) Regulation 2014, and orders or exemptions under the regulation.	
D50	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , or to any other place that can lawfully accept such waste.	Waste Management Plan
D51	All waste that is removed from site must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	Waste Management Plan
	Accommodation camp	
D52	Prior to establishing the accommodation camps, the Proponent must prepare an Accommodation Camp Management Plan to the satisfaction of Council, unless the Planning Secretary agrees otherwise. The plan must:	Accommodation Camp Management Plan
	 ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards, in consultation with Council; 	
	b) ensure the accommodation camp complies with conditions D21 and D46;	
	c) ensure any treated wastewater from the accommodation camps used for dust suppression during construction:	
	 complies with the Australian and New Zealand Environment and Conservation Council (ANZECC) & Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) (2000) guidelines for irrigation water quality; 	
	 meets the requirements of the Public Health Act 2010; 	
	d) include measure for dust suppression within the accommodation camps;	
	e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and	
	f) include measures to support local suppliers in servicing the camp where possible.	
	Following approval, the Proponent must implement the Accommodation Camp Management Plan.	
	Local Business and Employment Strategy	
D53	Prior to commencing construction, the Proponent must prepare a Local Business and Employment Strategy for the development in consultation with Council. This strategy must investigate options for prioritising the employment of local and Aboriginal workforce and suppliers for the construction of the development, where feasible.	Local Business and Employment Strategy
	The Proponent must implement the Accommodation and Employment Strategy.	
	Rehabilitation	
D54	Within 6 months of the completion of construction, upgrading or decommissioning, unless the Planning Secretary agrees otherwise, the Proponent must rehabilitate the areas where ancillary facilities, accommodation camps and earthwork material sites are located, to the satisfaction of the Planning Secretary. This rehabilitation must comply with the objectives in Table 3.	Appendix B3 Biodiversity Management Plan

Condition no.	Condition requirement			Document reference
	Table 3: Rehabilitation objectives			
	Feature	Objective		
	Ancillary facilities, accommodation camps, earthwork material sites, the existing 220 kV transmission line between Buronga substation and the NSW / Victoria border (Line 0X1), and the temporary bypass transmission line between Tower 1 and Tower 19 of existing transmission line 0X1.	 Safe, stable and non-polluting Progressively rehabilitate the site as soon as possible following disturbance To be decommissioned and removed, unless the Planning Secretary agrees otherwise 		
	Land use	To be decommissioned and removed, unless the Planning Secretary agrees otherwise		
	Community	Ensure public safety at all times		
	PART E - ENVIRONMENTAL MANA	GEMENT, REPORTING AND AUDITING		
	Revision of Strategies, Plans and P	Programs		
E1	The Proponent must review and, if ne of the Planning Secretary within 3 mo submission of an incident report of any modification to the condition	ort under condition E6; under condition E11; or	s required under this approval to the satisfaction	Construction Environmental Management Plan – Section 1.10, Section 8.3.1, and Section 9.3.
	Staging, Combining and Updating	Strategies, Plans or Programs		
E2	 With the approval of the Planning Secretary, the Proponent may: a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 			Construction Environmental Management Plan – Section 2.3
	If the Planning Secretary agrees, a str parties required to be consulted in the		ed without consultation being undertaken with all	

Condition no.	Condition requirement	Document reference
	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	
	If the Planning Secretary agrees, a strategy, plan or program may be staged without addressing particular requirements of the relevant condition of this approval if those requirements are not applicable to the particular stage.	
	Notifications	
	Notification of Department	
E3	Prior to commencing construction, operations, upgrading or decommissioning of the development or, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencing the relevant phase.	Construction Environmental
	If any of these phases of the development are to be staged, then the Proponent 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.	Management Plan – Section 2.3
	Final Layout Plans	
E4	Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including: d) details on siting of transmission towers, ancillary infrastructure and / or ancillary facilities; and e) showing comparison to the approved layout. The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.	Construction Environmental Management Plan – Section 1.7
	Work as Executed Plans	
E5	Prior to commencing operations, the Proponent must submit plans that confirm the constructed layout of the development and showing comparison to the final layout plans to the Planning Secretary, via the Major Projects website.	Not applicable to Stage 1. This condition is relevant prior to the commencement of the operational phase of the project.
	Incident Notification	
E6	The Department must be notified via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	Construction Environmental Management Plan – Section 8.3.1
	Non-compliance Notification	
E7	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.	Construction Environmental

Condition requirement	Document reference
	Management Plan – Section 10.1.1
A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Construction Environmental Management Plan – Section 10.1.1
A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Construction Environmental Management Plan – Section 10.1.1
Notification of Landowners	
Prior to the commencement of construction, the Proponent must notify the owners of the owners of R1489, R2022 and R2023 of their rights under condition D41.	Not applicable to Stage 1. Owners of R1489, R2022 and R2023 are not in the vicinity of Stage 1 works.
Independent Environmental Audit	
Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary.	Construction Environmental Management Plan – Section 9.3
Access to Information	
The Proponent must: a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) current statutory approvals for the development; (iii) approved strategies, plans or programs required under the conditions of this approval; (iv) the proposed staging plans for the development if the construction, decommissioning and/or operation of the development is to be staged; (v) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this approval; (vi) a record of complaints, which is to be updated on a monthly basis;	Community Communication Strategy
	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance. Notification of Landowners Prior to the commencement of construction, the Proponent must notify the owners of the owners of R1489, R2022 and R2023 of their rights under condition D41. Independent Environmental Audit Independent Audits of the development must be conducted and carried out at the frequency described and in accordance with the Independent Audit Post Approval Requirements (2020), unless otherwise agreed or directed by the Planning Secretary. Access to Information The Proponent must: a) make the following information publicly available on its website as relevant to the stage of the development: (i) the EIS; (ii) current statutory approvals for the development; (iii) approved strategies, plans or programs required under the conditions of this approval; (iv) the proposed staging plans for the development if the construction, decommissioning and/or operation of the development is to be staged; (v) a comprehensive summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;

Condition no.	Condition requirement	Document reference
	(viii) any other matter required by the Planning Secretary; and b) keep this information up to date.	
	APPENDIX 1 - DEVELOPMENT LAYOUT	
	APPENDIX 2 - OVER-DIMENSIONAL AND HEAVY VEHICLE ACCESS ROUTE	
	APPENDIX 3 - INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS	
	Written Incident Notification Requirements	
1.	A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under condition E6 or, having given such notification, subsequently forms the view that an incident has not occurred.	Construction Environmental Management Plan – Section 8.3.1
2.	Written notification of an incident must: a) identify the development and application number; b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); c) identify how the incident was detected; d) identify when the Proponent became aware of the incident; e) identify any actual or potential non-compliance with conditions of approval; f) describe what immediate steps were taken in relation to the incident; g) identify further action(s) that will be taken in relation to the incident; and h) identify a development contact for further communication regarding the incident.	Construction Environmental Management Plan – Section 8.3.1
3.	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Proponent must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	Construction Environmental Management Plan – Section 8.3.1
4.	The Incident Report must include: a) a summary of the incident; b) outcomes of an incident investigation, including identification of the cause of the incident; c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d) details of any communication with other stakeholders regarding the incident.	Construction Environmental Management Plan – Section 8.3.1

Table A6. 2 - Revised mitigation measure and reference document

Revised mitigation measure no.	RMM requirement	Reference document
	Biodiversity	
B1	Impacts to matters of biodiversity conservation significance will be avoided to the greatest extent practicable during finalisation of the detailed design and construction methodology for the project. Micro-siting of the transmission line infrastructure and associated construction working areas and other areas of disturbance will occur to avoid impacts wherever practicable. Site features with the highest biodiversity conservation significance, in particular, threatened species recorded and their habitat, including <i>Acacia acanthoclada</i> , <i>Atriplex infrequens</i> , <i>Austrostipa nullanulla</i> , <i>Dodonaea stenozyga</i> and <i>Santalum murrayanum</i> , will be given the highest priority.	Appendix B3 Biodiversity Management Plan
B2	Where vegetation disturbance activities are required in areas that have not previously been subject to biodiversity survey, additional survey will be carried out prior to works occurring to inform detailed design and construction methodology. These surveys will be carried out by a suitably qualified ecologist.	Not applicable to Stage 1 works. All of the Stage 1 work areas have been subject to biodiversity survey.
В3	Opportunities to locate site offices, compounds and ancillary facilities in areas of limited biodiversity value (e.g. cleared land or areas of native vegetation with vegetation integrity scores of less than 17 (in accordance with the NSW Government Biodiversity Assessment Method Operational Manual) will be prioritised.	Appendix B3 Biodiversity Management Plan
B4	Existing tracks and clearings will be used, where possible, to avoid the construction of new tracks. Where this is not possible, the design will seek to minimise impacts to native vegetation as a priority.	Not applicable to Stage 1 works. The existing tracks proposed to be used are located along the transmission line corridor.
B5	Transmission line structures will be located and constructed to minimise impact to vegetated riparian corridors, wherever practicable.	Not applicable to Stage 1 works. There are no riparian zones in the Stage 1 disturbance area.
B6	Conductor line-marking techniques will be implemented during detailed design to minimise bird strike. Use of bird diverters, most likely consisting of the "flapper" variety, will be implemented. Positioning and exact diverter model will be finalised during detailed design but at minimum these will be used within one kilometre of wetland / riverine habitats to reduce impacts on aerial fauna species from collision and allow safer passage within these areas.	Not applicable to Stage 1 works. There are no riparian zones in the Stage 1 disturbance area.
B7	TransGrid will establish a series of 20-metre-wide connectivity corridors near tower locations that occur in woodland vegetation. These would occur at strategic locations that would be developed as part of a Connectivity Strategy under the Biodiversity Management Plan. These connectivity corridors will involve native vegetation retention up to the 10 metre wide temporary construction centreline clearing zone to better facilitate woodland connectivity.	Not applicable to Stage 1 works. This requirement is applicable to the transmission line easement. A Connectivity Strategy will be provided in further revisions of the BMP.

Revised mitigation measure no.	RMM requirement	Reference document
B8	A two year monitoring program following the completion of construction will be implemented to better understand interactions of bird species with the transmission lines and towers. Problematic interactions identified during the program would be considered and options for addressing them implemented as practicable. Options that would be considered include nesting deterrents in high risk areas, installation of alternative nest habitat, relocation of nests or their deconstruction in certain circumstances.	Not applicable to Stage 1 works. This is applicable to the operational phase only.
B9	TransGrid will make a one off funding contribution targeted at further scientific study into the impacts of electric and magnetic fields on birds in Australia.	Not applicable to Stage 1 works. This RMM is applicable 'Prior to the completion of construction'.
B10	Nest boxes will be provided to offset the loss of tree hollow fauna habitat in accordance with a Supplementary Hollow and Nest Strategy. The strategy will include the following requirements: • survey of tree hollows and nests within the proposed clearing extents • the size, type, number and location of nest boxes required will be based on the results of the ecological surveys • appropriately sized nest boxes will be installed within the vicinity of hollow-bearing trees (subject to landholder agreement and suitable existing trees being present) no more than two weeks prior to clearing of the tree • all nest boxes in a particular location will be installed within 6 months after clearing • "nest boxes" will include consideration of natural tree hollow re-use and new tree hollow creation • measures to address and manage nests (such as raptor nests) pre-clearing will be included. Pre-clearing surveys will be completed prior to clearing at each location by a suitability qualified ecologist. The proposed clearing extents will be marked out on site prior to the pre-clearing surveys. During the surveys, the ecologist will: • survey the proposed clearing extent • identify any fauna that will require relocation prior to clearing	Appendix B3 Biodiversity Management Plan Supplementary Hollow and Nest Strategy Appendix B3 Biodiversity Management Plan Pre-clearing and Clearing Procedure
B12	 confirm the location and mark out the extents of any biodiversity exclusion zone confirm that hollow-bearing trees within and adjacent to the clearing extents are prominently marked/tagged confirm that nest boxes are in place (where required) in suitable locations adjacent to areas to be cleared, or suitable locations for installation have been identified. The results of the pre-clearing surveys will be used to update and confirm the accuracy of sensitive area maps.	Appendix B3 Biodiversity Management Plan
B13	Biodiversity exclusion zones for retained vegetation, including identified threatened flora populations will be clearly identified by a suitably qualified ecologist prior to the commencement of clearing or any site activity that could damage the vegetation within the exclusion zone. Biodiversity exclusion zones will be physically marked and demarcated, and included on sensitive area maps, prior to clearing.	Pre-clearing and Clearing Procedure Appendix B3 Biodiversity Management Plan Pre-clearing and Clearing Procedure

Revised mitigation measure no.	RMM requirement	Reference document
B14	Training on biodiversity management practices and the requirements for the project will be provided to all relevant project personnel, including relevant subcontractors, through inductions, toolbox talks and targeted training. Construction workforce will be supplied with sensitive area maps (showing clearing boundaries and exclusion zones), including updates as required.	Appendix B3 Biodiversity Management Plan Accommodation Camp Management Plan
B15	Clearing of native vegetation will be monitored to confirm actual impacts to biodiversity values to inform any final biodiversity offset requirements within the biodiversity offset package. The final offset requirements will be informed by a BAM-C calculation on the recorded clearing. Any additional credit liability identified by this calculation will be met.	Appendix B3 Biodiversity Management Plan
B16	Shrub or ground stratum native vegetation within vegetated riparian zones (within the definition of <i>Water Management Act 2000</i>) of the Great Darling Anabranch, Darling River and/or Murray River (and other defined riparian areas) will be protected to the greatest extent practicable, with vegetation clearing ideally limited to the tree stratum only, with trunk bases being retained in-situ.	Not applicable to Stage 1 works. There are no riparian zones in the Stage 1 disturbance area.
B17	Activities within vegetated riparian zones will be managed to minimise impacts to aquatic environments. Riparian areas subject to disturbance will be progressively stabilised and rehabilitated.	Not applicable to Stage 1 works. There are no riparian zones in the Stage 1 disturbance area.
B18	A species unexpected finds protocol will be implemented if threatened ecological communities, flora and fauna species, not assessed in the biodiversity assessment, are identified in the disturbance area.	Appendix B3 Biodiversity Management Plan Unexpected Threatened Species Finds Procedure Accommodation Camp Management Plan
B19	TransGrid will maintain vegetation for the project in accordance with commitments in the EIS, as amended in the Amendment Report. Vegetation maintenance protocols will be developed accordingly prior to the commencement of any vegetation maintenance activities within the easement and implemented during the operational phase of the project. The vegetation maintenance protocols will identify and address the biodiversity exclusion zones identified in the construction phase and the areas within the maintenance zone where the vegetation is not of a height/growth form that will ever require management. Relevant TransGrid operational personnel and associated vegetation maintenance contractors will receive in training in the vegetation maintenance protocols prior to the commencement of any vegetation maintenance.	Not applicable to Stage 1 works. This is applicable to the operational phase only.
B20	TransGrid will retire the total quantum of the project's biodiversity offset credit liability confirmed in accordance with the Biodiversity Assessment Method. TransGrid will develop a Biodiversity Offset Package that identifies measures to address the project's offset obligations and the timing and responsibility for implementation. Before commencing any project activities that impact biodiversity values, TransGrid will: • confirm the Biodiversity Offset Package with the Department of Planning, Industry and Environment, and	Appendix B3 Biodiversity Management Plan Biodiversity Offset Package will be prepared by TransGrid

Revised mitigation measure no.	RMM requirement	Reference document
	 provide security to the Minister for Planning and Public Spaces for a Biodiversity Conservation Fund payment to cover any outstanding offset credit liability if the package is not implemented. 	
	Aboriginal heritage	
AH1	The detailed design and construction methodology, and associated final disturbance area, will be developed to avoid impacts to features/items of Aboriginal archaeological significance as far as practical. Avoidance and minimisation of impact to features/items and Potential Archaeological Deposits (PADs) of moderate or higher archaeological significance will be prioritised.	Appendix B5 Heritage Management Plan
AH2	Aboriginal stakeholder consultation will be carried out in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010a).	Appendix B5 Heritage Management Plan
	Engagement with Registered Aboriginal Parties (RAPs) will consist of the following:	
	 Aboriginal heritage site surveys (AH3) – review of proposed methodologies and involvement in the survey activities in the field (for ground or vegetation disturbance outside of previously surveyed areas) 	
	 test excavation activities (AH4) – review of proposed methodologies and involvement in the test excavation activities in the field 	
	 review of the draft addendum report/s (relating to surveys (AH3), test excavations (AH4) and scar trees (AH5)), and consultation on the draft reports which will typically be in the form of a RAP meeting 	
	 provision of final addendum report/s will be provided to RAPs (AH3, AH4, AH5) 	
	 involvement in establishment of Aboriginal heritage exclusion zones prior to construction commencing (AH7). 	
	Further cultural information will be gathered during consultation undertaken in association with these activities. All addendum reports to the Aboriginal Cultural Assessment Report (CHAR) will be provided to RAPs for comment, and input will be considered, and actioned wherever practicable.	
АН3	An Aboriginal heritage survey will be carried out with RAPs where ground or vegetation disturbance activities are required in all locations outside of the previously surveyed heritage survey area (including water supply points), prior to works occurring in any such areas.	Not applicable to Stage 1 works. All areas for Stage 1 have been surveyed. This RMM is therefore not
	These surveys will be carried out in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (2010).	applicable to Stage 1.
	If no sites are found or if sites are found and they will not be impacted, then a letter report will be provided that gives notification of this and clearance to proceed.	
	Where sites are located and will be impacted, a draft survey addendum report/s to the ACHAR will be prepared for each of these survey areas. The report(s) will:	
	detail findings of the survey activities	
	 detail where test excavation is required in accordance with AH4 to inform detailed design 	
	 outline any additional mitigation strategies beyond those required by AH5 to AH12 	

Revised mitigation measure no.	RMM requirement	Reference document
	be presented to the RAPs for comment.	
	Final reports will be provided to RAPs and to Heritage NSW for their information prior to the commencement of construction that impacts these locations.	
AH4	In developing the detailed design and construction methodology, the construction contractor will review the location of all identified PADs and will aim to avoid and/or minimise direct impacts to the identified PADs.	Not applicable to Stage 1 works. No Stage 1 activities are proposed
	Where direct impacts cannot be avoided, test excavation programs will be carried out in the parts of any PADs where direct impact is likely (including where the root-ball of trees are being removed). The purpose of the test excavations will be to determine the presence or absence and significance of subsurface archaeological deposits.	within any identified PADs
	Test excavations works will be carried out in accordance with a methodology that is presented to and consulted on with the RAPs.	
	Test excavation addendum report/s to the ACHAR will be prepared for each test excavation program(s) which will:	
	detail findings of the test excavation activities	
	 outline how the detailed design has been further developed to avoid or minimise impacts to the identified constraints/features of significance/PADs 	
	 as applicable, detail any additional mitigation strategies beyond those required by AH6 to AH12, and the required timing for these to be implemented 	
	be presented to the RAPs for comment.	
	Final reports will be provided to RAPs and to Heritage NSW prior to the commencement of construction that impacts these locations. The addendum report(s) may be staged to enable progressive commencement of construction. Any additional mitigation strategies beyond those required by AH6 to AH12, and the required timing of implementation, will be included with the Construction Environmental Management Plan and implemented accordingly.	
AH5	All scarred trees identified during archaeological survey will be assessed by a qualified arborist to determine tree age and likely cause of the scarring in order to confirm the scientific significance prior to any impact to the scarred trees.	Not applicable to Stage 1 works. There are no scarred trees in the
	Impacts to all scarred trees (including those of cultural significance) will be avoided where possible through design or construction methodology and must only be removed for permanent infrastructure and/or to meet Vegetation Clearance Requirements at Maximum Line Operating Conditions (TransGrid, 2003).	location of the Stage 1 works, therefore this measure is not relevant to Stage 1.
	If any scarred tree cannot be avoided, the tree will be subject to 3D scanning, followed by salvage of the scarred trunk. The results of this assessment will be reported on in addendum reports.	
	Reports will be provided to RAPs for comment. Final reports will be provided to RAPs and to Heritage NSW.	
AH6	All portions of artefact scatters that are to be directly impacted will require surface collection prior to construction commencement in those areas.	Not applicable to Stage 1 works. There are no artefact scatters which
	Additionally, based on the outcomes of the test excavation, items or PADs will be subject to surface collection or salvage prior to the commencement of construction in those areas. The activities will be documented in a surface collection report.	will be directly impacted by Stage 1 works.

Revised mitigation measure no.	RMM requirement	Reference document
AH7	 Aboriginal heritage exclusion zones will be established to protect: known features/items of significance that have been identified to remain in-situ throughout construction (and not subject AH6) scarred trees that are to remain in-situ. Suitable controls will be identified in the heritage management sub-plan, which may include site fencing and sediment control. Aboriginal heritage zones will be demarcated by a suitably qualified archaeologist in consultation with the RAPs prior to the commencement of construction at each location. Areas of PADs that are located within areas of vegetation clearance where ground disturbance will not occur will be managed through construction methodologies and will not be delineated as exclusion zones. These methodologies will be developed in the heritage sub-plan. 	Appendix B5 Heritage Management Plan
AH8	Construction planning and management will ensure that indirect impacts to features of heritage significance located outside areas of direct impact do not occur (including physical disturbance from surface water drainage or other mechanism).	Appendix B5 Heritage Management Plan
АН9	Cultural and historic heritage awareness training will be carried out for all personnel working on the proposal prior to the personnel participating in construction activities. The training shall cover features of heritage significance within and adjacent to project locations and project protocols that must be complied with to minimise and manage potential impacts to those features.	Appendix B5 Heritage Management Plan
AH10	If at any time during construction, any items of potential Aboriginal archaeological or cultural heritage significance, or human remains are discovered, they will be managed in accordance with the Aboriginal heritage unexpected finds protocol (refer to Appendix 2 of the <i>Non-Aboriginal and Aboriginal Cultural Assessment Report</i> (Navin, 2021)).	Appendix B5 Heritage Management Plan Unexpected Heritage Finds Procedure Accommodation Camp Management Plan
AH11	A temporary repository of any retrieved archaeological material and Aboriginal objects will be appropriately secured and under the care of the archaeological consultant. The strategy for the long-term conservation of salvaged or collected Aboriginal objects will be determined in consultation with the RAPs.	Appendix B5 Heritage Management Plan
AH12	Features/items of heritage significance that will remain in-situ within the transmission line easement will be mapped and recorded within GIS systems managed by TransGrid. Relevant TransGrid systems and procedures will be updated as required with protocols that will be implemented during operation to ensure that impacts to the features/items of significance do not occur during maintenance activities. to ensure inadvertent impacts do not occur during maintenance activities.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.

Revised mitigation measure no.	RMM requirement	Reference document
	Non-Aboriginal Heritage	
NAH1	A non-Aboriginal heritage exclusion zone will be established for sites PEC-W-H-1 and PEC-W-SE-H1 (Survey Marker Trees). These sites will be fenced during construction and vegetation clearance for the proposal, to avoid inadvertent impacts during works. If impacts cannot be avoided, then the tree will be archivally recorded and research undertaken to confirm the nature and history of the item prior to impact occurring.	Not applicable to Stage 1 works. This measure is not relevant to Stage 1 works as the works are not in the vicinity of these items.
NAH2	Should the disturbance area for the proposal extend beyond the survey area, further assessment by an archaeologist will be carried to determine the likelihood of occurrence and significance of potential archaeology and impacts from the proposal (including built heritage) prior to the commencement of construction in these areas. The results of this assessment will be reported on in addendum reports for non-Aboriginal heritage. Reports will be provided to Heritage NSW.	Not applicable to Stage 1 works. All areas for Stage 1 have been surveyed. This RMM is therefore not applicable to Stage 1.
NAH3	If at any time during construction, any items of potential non-Aboriginal archaeological significance, or human remains are discovered, they will be managed in accordance with the non-Aboriginal unexpected finds protocol (refer to Appendix 2 of the <i>Non-Aboriginal & Aboriginal Cultural Heritage Assessment Report</i> (Navin, 2021)).	Appendix B5 Heritage Management Plan Unexpected Heritage Finds Procedure Accommodation Camp Management Plan
	Land use and property	
LP1	During detailed design, access tracks (temporary and permanent) will be determined in consultation with landholders and to minimise impacts to agricultural activities to the greatest extent possible. Where permanent tracks are required, a single access track will be designed to serve both temporary and permanent purposes, where possible.	Land and Property Access Management Plan
LP2	The locations of transmission line structures, other permanent structures and the extents of associated construction areas or compounds) will be located where possible to avoid or minimise impacts, or as agreed with the affected landholder, on: • cropping and irrigated horticultural land • areas used for set up and pack up of agricultural equipment, entry points and turning areas • radiocommunication sensitive areas • drainage catchments for farm dams • locations of high biosecurity risk.	Land and Property Access Management Plan
LP3	Final transmission line easement will be located parallel with existing transmission lines or road corridors or along property boundaries, where possible, to reduce potential fragmentation of properties and disturbance to existing land uses, subject to the outcomes of land access negotiations with affected landholders.	Not applicable to Stage 1 works. There are no transmission line easement works as part of the Stage 1 works.

Revised mitigation measure no.	RMM requirement	Reference document
LP4	 To minimise disruption to agricultural activities: landholders will be consulted regarding any required adjustments to property infrastructure (fences, access tracks, etc) and the proposed timing and location of construction works, especially where some restriction on vehicular or stock movements will be necessary. Appropriate arrangements will be negotiated with the affected parties and in place prior to any such disruption property infrastructure (such as gates) will be managed in accordance with landholder requirements and any damage caused by construction will be repaired promptly 	Land and Property Access Management Plan
	 use of existing roads, tracks and other existing disturbed areas will be prioritised where access is required across open spaces, care will be exercised to ensure that minimum damage is caused to the surface by confining vehicular or plant movement, as far as possible, to one route. 	
LP5	Disturbed areas will be stabilised and appropriately rehabilitated as soon as feasible and reasonable following the completion of construction. This will be carried out in consultation with the relevant landholder.	Not applicable to Stage 1 works. This requirement is relevant to the completion of construction.
LP6	Procedures will be implemented so that potential impacts or conflicts between livestock and construction activities are appropriately managed. Procedures will be developed in consultation with affected landholders will include management of: • noise intensive activities during sensitive periods within the livestock production cycle (such as lambing and calving) • vehicle movements and other activities within the vicinity of livestock • movement of stock away from potential stressors created by construction activities.	Appendix B1 Traffic and Transport Management Plan Appendix B2 Noise and Vibration Management Plan
LP7	Biosecurity controls will be implemented during construction to minimise the risk of off-site transport or spread of disease, pests or weeds. Controls will include (but not limited to): • inspections and cleaning of vehicles, machinery, and personnel equipment prior to movement on and off the construction work areas or between properties • minimising movements across adjoining farmland including trip numbers and locations • additional measures where localised areas of high biosecurity risks have been identified. The specific controls applicable to a property will be identified in consultation with the affected landholder. The effectiveness of these controls will be regularly monitored.	Appendix B3 Biodiversity Management Plan Biosecurity Management Plan Accommodation Camp Management Plan
LP8	Where present, weeds will be managed in consultation with Western Local Land Services (LLS), Wentworth Shire Council and NSW Department of Primary Industries.	Appendix B3 Biodiversity Management Plan Biosecurity Management Plan Accommodation Camp Management Plan

Revised mitigation measure no.	RMM requirement	Reference document
LP9	In the event of new infestations of notifiable weeds as a result of construction activities, the relevant control authority will be notified as per <i>Biosecurity Act 2015</i> and Biosecurity Regulation 2017.	Appendix B3 Biodiversity Management Plan Biosecurity Management Plan Accommodation Camp Management Plan
LP10	Fencing and access arrangements along the transmission line easement, such as locked gates, will be determined in consultation with landholders and implemented.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.
LP11	Biosecurity controls, confirmed in consultation with the affected landholders, will be implemented during operation to minimise the risk of off-site transport or spread of disease, pests or weeds during maintenance activities.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.
LP12	Where present within the operational transmission line easement and associated areas for permanent infrastructure, weeds will be managed in accordance with the <i>Biosecurity Act 2015</i> .	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.
LP13	Management of access including opening and closing of gates and monitoring of fencing will be done in accordance with landholder requirements. Any damage caused by maintenance activities will be repaired promptly.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.
	Landscape and visual amenity	
LV1	Opportunities for the retention and protection of existing trees within the disturbance area will be identified during detailed construction planning. Trees that do not pose any risk to the safe operation of the transmission infrastructure will be retained where practicable.	Not applicable to Stage 1. There will likely be limited opportunities for tree retention for Stage 1 as the area is required as an earthworks material site, camp and compound.

Revised mitigation measure no.	RMM requirement	Reference document
LV2	Temporary and permanent access will be designed to minimise vegetation removal, changes to landform, and visual impacts.	Not applicable to Stage 1. Access within the earthworks material site, substation, accommodation camp and construction compound will require clearing of vegetation. There is considered to be limited opportunity for access to be designed to minimise impacts for the Stage 1 disturbance area, as the access tracks will be located within the earthworks material area and within the construction compound and accommodation camp.
LV3	Proposed permanent engineering batters and water management measures will be designed to integrate with the existing landforms and natural features.	Construction Environmental Management Plan
LV4	Lighting at construction compound and accommodation camps will be designed and operated in accordance with AS4282-2019 Control of the obtrusive effects of outdoor lighting.	Construction Environmental Management Plan Accommodation Camp Management Plan
LV5	Transmission line structures, where possible, are designed: to maximise distance from private residences to use local vegetation and landform to provide screening from residences or from the road to be regularly spaced to reduce the potential visual impact where the proposal alignment is visible for a long duration, and in open landscapes to be positioned alongside existing transmission line structures where they are adjacent to existing transmission lines where feasible to avoid the location of transmission line structures on locally prominent landforms to minimise clearing along creeklines.	Not applicable to Stage 1 works. Stage 1 works does not include construction of the transmission line structures.
LV6	Where the transmission line crosses a roadway, transmission line structures will be located to maximise the distance from the roadway where feasible and where it will achieve an improved visual amenity outcome, where feasible and reasonable.	Not applicable to Stage 1 works. Stage 1 works does not include construction of the transmission line structures.

Revised mitigation measure no.	RMM requirement	Reference document
LV7	The Tree Protection Zone (as defined in AS4970-2009 Protection of Trees on Development Sites) of retained trees within or immediately adjacent to the disturbance area will be protected through the restriction of construction activities (refer Section 4.2 of AS4970- 2009), to minimise the impact of the works on the long term health of these trees.	Appendix B3 Biodiversity Management Plan
LV8	Opportunities for screening vegetation to be provided on private property will be investigated where, once at a mature height, it will reduce an identified visual impact from a residence. This will be undertaken in negotiation with the affected resident. This will be informed by further assessment to determine the extent of the impact and appropriateness of any screening vegetation. Any such screening vegetation will be planted prior to completion of construction and will be maintained by the landholder.	Not applicable to Stage 1 works. Stage 1 works does not include screening vegetation works.
LV9	Lighting at the substation will be designed and operated in accordance with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting.	Not applicable to Stage 1 works. Stage 1 works does not include the operation of Buronga substation.
	Social and economic	
SE1	 A Community and Stakeholder Engagement Plan will be implemented. This will include: targeted stakeholder consultation with Local Government, chamber of commerce, Traditional Owners, landholders, emergency services and service providers to ensure plans for the proposal are integrated with local needs and priorities and proactively respond to community or stakeholder concerns including those of neighbouring or nearby landholders culturally appropriate ceremonies of recognition aligned with proposal activities and key milestones, in alignment with the TransGrid Reconciliation Action Plan. 	Community Communication Strategy
SE2	All acquisitions of privately-owned land would be carried out in consultation with the landholders through the private treaty process or in accordance with the requirements of the <i>Land Acquisition (Just Terms Compensation) Act 1991</i> and the supporting NSW Government Land Acquisition Reform 2016.	Not applicable to Stage 1 works. Transgrid is responsible for the acquisitions of privately-owned land required for the project.
SE3	A Local Business and Employment Strategy will be implemented to guide local opportunities during construction, and where possible, align with existing plans and strategies of Wentworth Shire Council and Mildura Rural City Council, and TransGrid's Reconciliation Action Plan. The initiatives will be prepared in consultation with Wentworth Shire Council, Mildura Rural City Council and key community stakeholders and organisations in the region. The strategy will consider local market conditions and capacity, and will include initiatives for: I local supplier and labour procurement targets Aboriginal workforce and business participation training and upskilling programs for local labour force programs to inform local businesses of contracting opportunities and requirements	Local Business and Employment Strategy Accommodation Camp Management Plan

Revised mitigation measure no.	RMM requirement	Reference document
	 consideration of use of available local infrastructure and services for construction activities such as the Wentworth Aerodrome, where feasible 	
	transitioning the local workforce following the completion of construction.	
SE4	A Community Benefit Plan will be implemented to guide opportunities to deliver benefits to local communities during and following construction. The plan will be prepared in consultation with Wentworth Shire Council, Mildura Rural City Council and key community stakeholders and organisations in the region, and will align with TransGrid's Community Partnerships Program.	Community Benefit Plan
	The plan will include (but is not limited to):	
	 initiatives to create positive social contributions in local communities and to respond to community priorities and needs 	
	 initiatives for Aboriginal heritage impacts of the proposal to be managed in partnership with local Aboriginal organisations 	
	exploring opportunities to repurpose temporary infrastructure to address local infrastructure needs.	
SE5	A Workforce Management Plan will be implemented to provide construction workforce support services to promote health and wellbeing and to manage positive social integration with existing communities.	Workforce Management Plan
	The plan will be prepared in consultation with Wentworth Shire Council, Mildura Rural City Council and social infrastructure service providers near accommodation camps so that the needs of the construction workforce are coordinated to minimise pressure on existing health services and social infrastructure.	
	Hydrology, flooding and water quality	
HF1	Permanent operational infrastructure and landforms within the transmission line corridor will be designed and implemented/formed to minimise any potential scour and erosion risks associated with surface water runoff.	Appendix B4 Soil and Water Management Plan
HF2	Detailed construction planning will consider flood risk at construction areas. This will include identification of measures	Not applicable to Stage 1 works.
	that will be implemented to not worsen flood impacts downstream and on other property and infrastructure during construction up to and including the 1% AEP flood event, and review of site layout and staging of construction works to avoid or minimise obstruction of overland flow paths and to limit the extent of flow diversion required.	Stage 1 disturbance area is identified as flood prone land
	Procedures as detailed in the flood emergency management procedures will be implemented in response to flood events, including the evacuation of personnel.	
HF3	A water quality monitoring program will be implemented to establish baseline water quality conditions in the Darling	Not applicable to Stage 1 works.
	River, Darling Anabranch and Murray River prior to construction, and to observe any changes in water quality that may be attributable to the proposal during construction. The frequency, location and duration of sampling will be detailed in the monitoring program, but will include:	The Darling River, Great Darling Anabranch or Murray River are not in the vicinity of Stage 1 disturbance
	 at least two monitoring locations located downstream and upstream of the proposal on the Darling River, Darling Anabranch and, Murray River 	area.
	 monitoring for total dissolved solids, total suspended solids, total nitrogen and total phosphorus. 	

Revised mitigation measure no.	RMM requirement	Reference document
	Sampling will commence at least 6 months prior to the commencement of construction at each respective location, and then monthly during construction until the surfaces in the vicinity of the waterways that were disturbed by proposal activities are adequately stabilised and no longer pose a significant sedimentation risk to the waterways. The monitoring program will include corrective and preventative actions that will be taken to address any water quality issues caused by the proposal, as indicated by the water quality monitoring results.	
HF4	Water supply options and management will be undertaken in accordance with agreements between the construction contractor and Wentworth Shire Council.	Appendix B4 Soil and Water Management Plan Accommodation Camp Management Plan
HF5	 Erosion and sediment measures will be implemented in accordance with the principles and requirements in: Managing Urban Stormwater – Soils and Construction, Volume 1 (Landcom 2004), and Volumes 2A and 2C (NSW Department of Environment, Climate Change and Water 2008), commonly referred to as the 'Blue Book' Best Practice Erosion and Sediment Control (IESCA – 2008) TransGrid's HSE Guideline Guidelines for Controlled Activities on Waterfront Land (NRA 2018). 	Appendix B4 Soil and Water Management Plan Erosion and Sediment Control Strategy Accommodation Camp Management Plan
HF6	Maintenance works in the vicinity of waterways will be conducted in accordance with the TransGrid's HSE Guideline.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.
	Air Quality	
AQ1	Construction air quality management measures will be detailed in the Air Quality Management Plan and implemented during construction to minimise particulate and gaseous emissions as far as possible. Measures will include (but not limited to): use of water sprays or dust suppression surfactants as required for dust suppression where required and appropriate adjusting the intensity of activities based on observed dust levels and weather forecasts minimising the amount of materials stockpiled and position stockpiles away from surrounding receivers vehicle movements to be strictly limited to designated entry/exit routes and parking areas, and measures to minimise the tracking of material onto paved roads covering of loads stabilising disturbed areas as soon as practicable, including new access routes	Air Quality Management Plan Accommodation Camp Management Plan
	 stabilising disturbed areas as soon as practicable, including new access routes minimising the extent of disturbance as far as practicable 	

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Revised mitigation measure no.	RMM requirement	Reference document
	 regularly conducting visual inspections of dust emissions and applying additional controls as required. 	
AQ2	Ensure that all vehicles and machinery are fitted with appropriate emission control equipment and maintained in a proper and efficient manner.	Air Quality Management Plan Accommodation Camp Management Plan
AQ3	Measures will be implemented at concrete batching plants to minimise emissions to air as far as possible and will be regularly inspected with additional controls implemented as required. Measures to minimise emissions to air may include:	Air Quality Management Plan
	 all aggregate and sand will be stored appropriately in storage bins or bays to minimise dust generation, and material will not exceed the height of the bay 	
	 cement silos and hoppers will be fitted with dust filters 	
	all inspection points and hatches will be fully sealed	
	 all dry raw materials to be transferred into the bowl of an agitator via front end loaders by maintaining adequate moisture levels and/or an enclosed conveyor 	
	the cement silo will be fitted with fitted with emergency pressure alert and automatic cut off overfill protection	
	 transfer of cement from storage to batching will occur via sealed steel augers 	
	 regularly inspect dust emissions and apply additional controls as required. 	
AQ4	To minimise dust emissions associated with the proposed crushing and screening activities, the following will be implemented:	Air Quality Management Plan
	ensure screen covers are fitted to the screening operations	
	 control dust emissions from crushing operations using water sprinklers, where required and appropriate 	
	 inspect the water sprinklers on a regular basis to ensure operational efficiency 	
	 where practicable, install wind breaks in appropriate locations adjacent to the dust generating equipment and processes 	
	 prior to crushing, dampen the rocks during dry weather conditions. 	
AQ5	To ensure potential odour emissions from the wastewater treatment plants are minimised, the following additional management measures will be implemented:	Air Quality Management Plan Accommodation Camp Management
	 prevent excessive inorganic material accumulating on the screens by disposing of screened material in waste bins on a regular basis 	Plan
	 place waste bins containing screened material and sludge as far away as practicable from the construction compound and accommodation sites 	
	ensure waste bins are fully closed at all times	
	 remove screened material and sludge from site at regular intervals and dispose in an appropriate manner. 	

Revised mitigation measure no.	RMM requirement	Reference document
	Noise and vibration	
NV1	An Operational Noise Review will be prepared to confirm the predicted noise impacts from the proposal (based on the final detailed design) and refine the operational mitigation measures that will be implemented so operational noise impacts complies with the proposal noise trigger levels, where feasible and reasonable.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.
NV2	Where exceedances of the project proposal specific trigger noise levels are predicted, feasible and reasonable operational noise and vibration mitigation measures will be further investigated during detailed design, in consultation with the affected receivers. This may include (in order of priority): • land use planning and provision of appropriate buffer distances to increase the distance between the final transmission line alignment and the surrounding sensitive receivers and ultimately minimise the number of sensitive receivers within the audible risk noise zones	Not applicable to Stage 1. This mitigation measure is only applicable to the 330kV transmission line.
	noise control at the noise source	
	 noise control along the noise transfer path, such as noise barriers. 	
	 noise control at the receiver, such as 'at property' treatment to upgrade aspects of the dwellings including the façade or ventilation systems. 	
	Additional measures identified through this process will be implemented prior to commencement of operation.	
NV3	Construction methodologies and measures that minimise noise and vibration levels during construction will be investigated during detailed design and implemented where feasible and reasonable.	Appendix B2 Noise and Vibration Management Plan
	This will be supported through the completion of additional assessments (where construction noise levels are likely to exceed relevant noise management levels based on the final construction methodology). This will:	
	 consider the proposed layouts of work areas or construction compounds and accommodation camps 	
	the noise and vibration generating activities that will take place	
	assess the predicted noise and vibration levels against the relevant management levels	
	incorporate feasible and reasonable mitigation and management measures in accordance with the ICNG.	
NV4	Further engagement and consultation with affected receivers will be carried out to understand their preferences for mitigation and management measures where exceedances of noise management levels are predicted. Based on this consultation, appropriate mitigation and management options will be considered and implemented where feasible and reasonable to minimise the impacts.	Appendix B2 Noise and Vibration Management Plan Out of Hours Work Protocol Community Communication Strategy Accommodation Camp Management Plan

Revised mitigation measure no.	RMM requirement	Reference document
NV5	A Construction Noise and Vibration Management Plan (CNVMP) will be prepared by the construction contractor prior to construction works and will (as a minimum):	Appendix B2 Noise and Vibration Management Plan
	 examine feasible and reasonable noise mitigation where management levels are likely to be exceeded examine feasible and reasonable noise measures to manage traffic noise impacts on public roads where exceedances above 2 dB are identified at any sensitive receiver 	Community Communication Strategy
	describe associated noise and vibration monitoring programs, as required	
	describe proactive and reactive strategies for dealing with any noise complaints	
	 outline community consultation measures including notification requirements. 	
	This CNVMP will be implemented for the duration of construction.	
NV6	An out of hours works (OOHW) protocol will be implemented for all construction activities likely to generate noise levels above the relevant noise management level at any sensitive receiver outside the standard construction hours defined in <i>Interim Construction Noise Guideline</i> (DECC, 2009). The OOHW protocol and will include:	Appendix B2 Noise and Vibration Management Plan Out of Hours Work Protocol
	 details of what works are required outside standard construction hours 	
	 noise management safeguards and other reasonable and feasible mitigation and management measures (including agreement with sensitive receivers), including avoiding or minimising activities or the use of equipment likely to generate the highest noise levels, and implementing respite periods where works are likely to result in NML exceedances for sensitive receivers 	
	 community consultation procedures, including letterbox drops, notification protocols, and site contact information for the works 	
	complaints handling procedures.	
	The OOHW protocol would not apply to the operation of the accommodation camps at Buronga and Wentworth.	
NV7	Where noise intensive equipment is to be used near sensitive receivers and is likely to result in an exceedance of the applicable noise management level, the works will be scheduled for during standard construction hours (unless	Appendix B2 Noise and Vibration Management Plan
	agreements with affected sensitive receivers have been reached).	Out of Hours Work Protocol
NV8	Where residences or other sensitive receivers/structures are within the minimum working distances for vibration (as	Not applicable to Stage 1.
	identified in Table 17-3 of the EIS):	No residences or other sensitive
	 different construction methods with lower source vibration levels will be investigated and implemented, where feasible 	receivers/ structures are within the minimum working distances for
	 attended vibration measurements will be undertaken at the start of the works to determine actual vibration levels at the structure. Works will cease if the monitoring indicates vibration levels are likely to, or do, exceed the relevant criteria. 	vibration as a result of the Stage 1 works.
NV9	Temporary batching plants along the transmission line corridor will be positioned to ensure compliance with NMLs at the nearest sensitive receivers.	Not applicable to Stage 1.

Revised mitigation measure no.	RMM requirement	Reference document
		No batching plants are proposed as part of the Stage 1 works.
NV10	If blasting is required, a blasting vibration and overpressure assessment will be completed to demonstrate that blasting and associated activities will not exceed noise and vibration limits at residences or other sensitive receivers. Based on outcomes of this assessment, a blast management strategy will be implemented that details how blasting will be carried out in a manner that complies with relevant noise and vibration limits, and notification requirements with landholders.	Not applicable to Stage 1. No blasting is proposed for the project.
	Traffic	
TA1	Site access / egress points will be designed to minimise conflicts with vehicle movements on the road network and in accordance with relevant safety requirements. This may include the provision of acceleration and deceleration lanes at accommodation camp locations. Any designs will be in accordance with the Traffic Control at Worksites, Austroads Guide to Road Design and Austroads Guide to Traffic Management, and approved by the relevant road authority.	Appendix B1 Traffic and Transport Management Plan Traffic Strategy
TA2	Road pre-condition surveys will be carried out for the public road network in the vicinity of access points to construction compounds, construction camps and construction areas, and for roads for which proposal-related traffic within the Wentworth Shire LGA will be the main source of traffic prior to the use of the roads by proposal-related heavy vehicles. The pre-condition surveys will be undertaken in consultation with relevant councils and road owners. This will include identification of existing conditions and mechanisms to repair damage to the road network caused by construction vehicles associated with the proposal.	Appendix B1 Traffic and Transport Management Plan Independent dilapidation surveys reports
	Construction access routes will be subject to regular inspections, in consultation with the relevant roads authority, to monitor the condition of these roads. Any identified issues attributable to project-related use will be rectified to maintain road safety.	
TA3	The community will be notified in advance of proposed road network changes through appropriate forms of communication.	Appendix B1 Traffic and Transport Management Plan
TA4	Road Occupancy Licence(s) will be sought (as required) for any road closures (full or partial) prior to any such closure. The timing of any closures will be carried out to minimise impacts to the road network in accordance with the conditions of the licence.	Appendix B1 Traffic and Transport Management Plan
TA5	Permits from the National Heavy Vehicle Regulator (NHVR) will be obtained where required to provide oversized and overmass vehicles access during construction. Permit applications will be supported by a Vehicle Movement Plan (VMP), prepared to indicate the proposed heavy vehicle route(s). The Vehicle Movement Plan will consider activities of adjoining land uses and safety of the public, particularly when entering urban areas from rural highways.	Appendix B1 Traffic and Transport Management Plan
TA6	Construction access/egress, and construction movements, will be managed to ensure pedestrian and cyclist safety.	Appendix B1 Traffic and Transport Management Plan

Revised mitigation measure no.	RMM requirement	Reference document
ТА7	Adjustments to haulage routes in response to road closures by Wentworth Shire Council (e.g. during wet weather conditions or during other maintenance or other upgrade activities) will be identified in consultation with Wentworth Shire Council and affected residents, and suitable management measures identified and implemented.	Appendix B1 Traffic and Transport Management Plan
TA8	Access to properties for emergency vehicles will be provided at all times.	Appendix B1 Traffic and Transport Management Plan Accommodation Camp Management Plan
TA9	Access to properties will be maintained or alternative arrangements agreed in consultation with landholders.	Appendix B1 Traffic and Transport Management Plan
TA10	Following completion of construction, condition surveys will be carried out. Any damage as a result of construction vehicles will be repaired following the completion of construction (and as needed through the construction period to maintain safe road conditions).	Appendix B1 Traffic and Transport Management Plan
TA11	TransGrid will commit to a Road Maintenance Agreement with Wentworth Shire Council to ensure appropriate remediation of roads used by project-related vehicles to address any damage and deterioration caused by the construction of the proposal.	Appendix B1 Traffic and Transport Management Plan
	Hazards and risks	
HR1	The proposal will be designed and constructed in accordance with the Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz – 100 kHz) (International Commission on Non-Ionizing Radiation Protection (ICNIRP), 2010) The design will meet the EMF exposure guidelines set out in Table 19-2 of the EIS and worst case scenarios within	Construction Environmental Management Plan
HR2	TransGrid's <i>Transmission Line Design Manual – Major New Build</i> . A minimum 50m wide managed Asset Protection Zone will be provided to the hazard perimeter of the fixed construction equipment and camp site buildings unless an alternative fire protection approach that achieves the same level of bushfire risk management is identified by a suitably qualified specialist during detailed design.	Emergency Plan Accommodation Camp Management Plan
	Any Asset Protection Zone zone will be regularly maintained to provide a maximum grass height of 100mm -150mm during the prescribed Bushfire Danger Period and when the grassland fuel reaches 70 per cent cured. Vegetation inside the main construction compounds and accommodation camp sites will be regularly maintained to a maximum height of 75mm.	
HR3	Buildings within the construction compound and camp site will be constructed to comply with Section 3 and Section 5 (BAL 12.5) of A.S. 3959 – 2018 – Construction of Buildings in Bushfire Prone Areas'. The sub-floor space of each building will be enclosed with stainless steel flymesh securely fixed to the external wall/s and buried into the ground. All joints will be overlapped and sealed.	Emergency Plan Accommodation Camp Management Plan

Revised mitigation measure no.	RMM requirement	Reference document
HR4	Water for fire-fighting operations will be confirmed during detailed design with consideration to occupancy density and site layout. This will include onsite static water supply and fire-fighting hose reels. All weather access having a minimum width of 4 metres will be provided to the static water supply tanks.	Emergency Plan Accommodation Camp Management Plan
HR5	Consultation with emergency services, including the Rural Fire Service and Fire and Rescue NSW will be undertaken during detailed design to ensure emergency access provisions are provided during operation.	Emergency Plan Accommodation Camp Management Plan
HR6	Prior to the occupation of the construction camps and offices, all bush fire protection and mitigation measures would be certified as compliant with relevant regulatory requirements by a suitably qualified bush fire consultant.	Emergency Plan Accommodation Camp Management Plan
HR7	Shielding will be used and a water supply (nine kilogram water fire extinguisher) and trained operator present during all outdoor hot works/grinding activities, and during vegetation slashing within and adjacent to the construction compound and camp sites. No outdoor hot works will be undertaken during periods of Total Fire Ban and Catastrophic Fire Weather Days unless there is a suitable fire suppression unit present on site and only with prior agreement with local fire services.	Emergency Plan Accommodation Camp Management Plan
HR8	All chemicals, fuels or other hazardous substances will be stored in accordance with the supplier's instructions and relevant legislation, Australian Standards and applicable guidelines. The capacity of any bunded area shall be at least 130 per cent of the largest chemical volume contained within the bunded area. The location of the bunded enclosure/s shall be shown on the site plans.	Appendix B4 Soil and Water Management Plan Accommodation Camp Management Plan
HR9	Dangerous goods and hazardous substances will be transported in accordance with relevant legislation and codes, including the <i>Dangerous Goods (Road and Rail Transport) Act 2008</i> , Road and Rail Transport (Dangerous Goods) (Road) Regulation 1998 and the <i>Australian Code for the Transport of Dangerous Goods by Road and Rail</i> (National Transport Commission, 2007).	Appendix B1 Traffic and Transport Management Plan
HR10	Appropriate spill containment equipment will be provided and located at strategic, accessible locations.	Appendix B4 Soil and Water Management Plan Accommodation Camp Management Plan
HR11	Security measures will be implemented to minimise the risk of arson within and adjoining construction areas. The location of appropriate security measures will be determined using a risk based approach.	Emergency Plan Accommodation Camp Management Plan
HR12	All chemicals or other hazardous substances at the Buronga substation will be stored in bunded and weatherproof facilities away from drainage lines, and in accordance with supplier's instructions and relevant legislation, Australian Standards and applicable guidelines. The capacity of the bunded area will be at least 130 per cent of the largest	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is

Revised mitigation measure no.	RMM requirement	Reference document
	chemical volume contained within the bunded area. The location of the bunded enclosure/s will be shown on the site plans.	therefore not applicable to Stage 1 works.
HR13	Emergency spill procedures will be implemented to avoid and manage accidental spillages of fuels, chemicals or fluids during operation and maintenance activities in accordance with the TransGrid's HSE Guideline. Environmental spill kits will be provided at strategic, accessible locations, and staff will be trained in spill response procedures.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.
HR14	The proposal will be designed, operated and maintained in accordance with TransGrid's Bushfire Risk Management Plan. This includes reduction in fuel loads, management of asset protection zones and inspections of infrastructure.	Emergency Plan Accommodation Camp Management Plan
HR15	The Buronga substation Emergency Response Manual will be updated to include the new proposed design and required revised emergency response procedures.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works.
	Soils, contamination and groundwater	
SCG1	Locations of transmission line structure foundations, and ancillary construction sites will be positioned to avoid disturbance to any known farm dams where practicable.	Not applicable to Stage 1 works. There are no known farm dams in the vicinity of the Stage 1 disturbance area.
SCG2	Existing areas of waterlogging and poor drainage will be avoided, where possible, with regard to both access tracks and permanent structures.	Appendix B4 Soil and Water Management Plan
SCG3	Construction materials will be selected to withstand high saline soil and groundwater environment (where applicable).	Appendix B4 Soil and Water Management Plan
SCG4	A review of additional geotechnical and hydrogeology data, and any publicly available mapping of high priority groundwater dependant ecosystems (GDEs) as documented in the latest relevant water sharing plan, will be carried out to confirm the groundwater conditions and to: • determine if any additional mitigation measures are required to limit groundwater inflows, or impacts to GDEs • confirm no or minimal impact to groundwater sources as per the minimal impact criteria listed within the Aquifer Interference Policy.	Appendix B4 Soil and Water Management Plan
SCG5	Disturbance to areas of medium risk of contamination will be avoided or minimised where practicable during construction. This includes the position of foundations for transmission line structures and ancillary construction sites.	Not applicable to Stage 1 works.

Revised mitigation measure no.	RMM requirement	Reference document
	Areas of medium risk of contamination that will be disturbed by construction activities will be further investigated including completion of a site inspection. Where considered to be required, a Phase 2 investigation will be completed in accordance with NEPM 2013.	Areas of disturbance subject to Stage 1 of the project were identified as low contamination risk.
	Mitigation measures identified through further investigation will be implemented.	
SCG6	To limit the potential for groundwater inflows, the construction methodology for transmission line structure foundations will ensure that excavations will not occur within 40 metres of the Darling River, Great Darling Anabranch or Murray River. Where groundwater may be encountered, the design and construction methodology will be adjusted to minimise	Not applicable to Stage 1 works. The Darling River, Great Darling Anabranch or Murray River are not in the vicinity of Stage 1 disturbance
	groundwater inflows. The depth of groundwater will be confirmed prior to commencement of construction at each relevant transmission line structure locations.	area.
SCG7	Direct impacts to registered bores GW088454 (nested), GW087531 and GW600452 will be avoided, where possible. If the bores are: • not required to be removed during construction, then they will be clearly demarcated with a 5x5 metre construction exclusion zone • are to be removed during construction or unavoidably damaged, then make good provisions will apply in consultation with the registered bore owner.	Not applicable to Stage 1 works. Registered bore GW087531 is located on the opposite side of Arumpo Road and outside the indicative Stage 1 disturbance area.
SCG8	Prior to ground disturbance in areas of potential acid sulfate soil occurrence (e.g. in low lying areas surrounding former or current lakes and river beds), testing would will be carried out to determine the presence of actual and/or potential acid sulfate soils. If acid sulfate soils are encountered, they will be managed in accordance with the <i>Acid Sulfate Soil Manual</i> (ASSMAC, 1998) and TransGrid's HSE Guideline.	Not applicable to Stage 1 works. Areas of disturbance subject to Stage 1 of the project were identified as having a low risk of acid sulfate soils.
SCG9	Prior to ground disturbance, a visual inspection will be undertaken for the presence of saline soils. Areas of known or suspected salinity will be subject to further testing as required. If salinity is confirmed, excavated soils will be managed in accordance with <i>Book 4 Dryland Salinity: Productive use of Saline Land and Water</i> (NSW DECC 2008) and the <i>Salinity Training Manual</i> (DPI, 2014) to manage salinity impacts. Erosion controls will be implemented in accordance with <i>The Blue Book</i> (Landcom, 2004).	Appendix B4 Soil and Water Management Plan
SCG10	Earthworks and construction activities that result in compaction of soils will be limited where possible in areas within 40 metres of the Darling River, Murray River and Great Darling Anabranch to prevent potential impacts to groundwater.	Not applicable to Stage 1 works. The Darling River, Great Darling Anabranch or Murray River are not in the vicinity of Stage 1 disturbance area.
SCG11	A bore condition assessment is to be conducted prior and post construction on GW088454 (nested), GW087531 and GW600452 where required to identify any adverse impact to the bores integrity that may have resulted during construction.	Appendix B4 Soil and Water Management Plan

Revised mitigation measure no.	RMM requirement	Reference document
	If impacts are identified, repair or replacement of the bore will be undertaken in discussion with the registered owner.	
SCG12	Construction materials, spoil and waste will be suitably stored to minimise the potential for soil, groundwater or water quality impacts.	Appendix B4 Soil and Water Management Plan
		Accommodation Camp Management Plan
SCG13	The discovery of previously unidentified contaminated material will be managed in accordance with a contamination unexpected finds procedure.	Appendix B4 Soil and Water Management Plan
		Unexpected Contamination Finds Procedure
		Accommodation Camp Management Plan
SCG14	The application of treated wastewater will be managed so that:	Accommodation Camp Management
	 application rates account for soil conditions and the protection of water quality (including groundwater). This includes salinity conditions and the prevention of runoff from application areas 	Plan
	 buffer distances to sensitive receivers (such as waterways and farm dams) as set out in Designing and Installing On-Site Wastewater Systems (WaterNSW, 2019) are met 	
	climatic conditions are considered during application to ensure treated wastewater is applied to intended areas	
	equipment used will reflect the management of human, livestock and environmental risks.	
SCG15	Incident response procedures for wastewater treatment plants (and use of treated wastewater) will be implemented to avoid, minimise and manage accidental spills or other incidents that impact the function of the wastewater treatment plants.	Accommodation Camp Management Plan
SCG16	A site-specific risk assessment will occur for locations where there is a risk of encountering UXO. The risk assessment will be carried out prior to any activities that could interact with UXO. This will include field verification to validate the historical assessment of UXO contamination and identify appropriate mitigation practices. The risk assessment will occur with input from an appropriate UXO specialist and will identify if and when an explosives engineer is required during site activities.	Not applicable to Stage 1 works. Identified UXO prone areas are not in the vicinity of Stage 1 disturbance area.
	An unexpected finds procedure will be implemented. The procedure will specify the actions that site personnel must take to minimise the risk to and from any UXO encountered.	
	The management actions identified in the risk assessment will be implemented prior to and during all relevant site activities. All personnel conducting intrusive works within an identified UXO area will be provided with appropriate safety and awareness briefing(s) prior to the participating in the intrusive works.	
	Waste management and resources	
WM1	The proposal will achieve an ISCA verified 'Design' and 'As-built' rating of Excellent under v1.2 of the IS rating tool.	Sustainability Strategy
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Revised mitigation measure no.	RMM requirement	Reference document
WM2	Measures to minimise excess spoil generation will be investigated at detailed design. This will include a focus on optimising the design to minimise spoil volumes and the reuse of material on-site.	Waste Management Plan
WM3	Opportunities to re-use or recycle construction and demolition waste will be investigated during detailed design.	Waste Management Plan
WM4	All waste will be assessed, classified, managed and disposed of in accordance with the Waste Classification Guidelines (NSW EPA, 2014).	Waste Management Plan Accommodation Camp Management Plan
WM5	Waste streams will be segregated to avoid cross- contamination of materials and maximise reuse and recycling opportunities.	Waste Management Plan Accommodation Camp Management Plan
WM6	All waste generated and surplus spoil to be removed from the construction of the proposal will be transported to appropriately licensed waste disposal transfer facilities or other facilities lawfully able to accept materials.	Waste Management Plan Accommodation Camp Management Plan
WM7	Waste during operations will be managed in accordance with TransGrid's existing Environmental Management System and processes for the identification, classification, handling and management of waste.	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works
WM8	All waste will be assessed, classified, managed and disposed of in accordance with the <i>Waste Classification Guidelines</i> (NSW EPA, 2014).	Not applicable to Stage 1. This mitigation measure is associated with the operational phase and is therefore not applicable to Stage 1 works
	Cumulative impacts	
CI1	Co-ordination of traffic management arrangements between major construction projects will occur in consultation with the relevant road authorities (Transport for NSW and local councils) and/or other proponents as relevant. This will consider any potential conflicts in relation to deliveries and identified haulage routes during the program.	Appendix B1 Traffic and Transport Management Plan

Appendix B – Environmental Management Pla
