BARNETT & MAY

EnergyConnect PEC East Project

SSI 9172452

March 2024 Construction Phase Independent Environmental Audit

Prepared for

Secure Energy

Client representative

Rebecca Walker-Edwards

Date:13 June 2024

Rev 1

Contents

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Appendices

Prepared by — K. Holmes		**Date 13 June 2024**

Revision History

Rev No.	**Description**	**Prepared by**	**Reviewed by**	**Authorised by**	**Date**
A	Draft for client Review	K Holmes	M Holmes	K Holmes	30/5/2024
0	Final Report	K Holmes	K Holmes	K Holmes	13/6/2024
1	Revised findings based on additional evidence presented to the Auditor.	K Holmes	K Holmes	K Holmes	13/6/2024

1. Introduction

Barnett & May was engaged by Green Light Contractors PTY LTD, trading as Secure Energy (ABN 56 282 382 697) to conduct the third construction phase Independent Environmental Audit (IEA) of the Secure Energy PEC East Project.

The project consists of the construction of a 330 kV high voltage energy connector between Wagga Wagga and Buronga in Southern NSW. Transgrid is the Proponent, Secure Energy is the Construction Contractor.

The Project involves building around 375km of new 330kV transmission line between Buronga and the new Dinawan substation (Bundure), near Coleambally as well as just over 160km of 500kV transmission line infrastructure from Dinawan to Wagga Wagga. Upgrades are also currently underway at the existing substations at Buronga and Wagga Wagga.

The Infrastructure Approval (SSI 9172452) covers both the construction and operational phases of the Project. Condition D11 requires that "*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*"" .

The audit was undertaken in accordance with the Barnett and May's proposal dated 27 September 2023, and the requirements of the NSW of Planning and Environment (DPE) Independent Audit Post Approval Guidelines (May 2020). The Audit was commissioned 14 November 2023. DPE approved the appointment of the Auditor on 5 December 2023.

The audit was undertaken by Ken Holmes (Accredited Lead Auditor) of Barnett & May and commenced with the site inspection undertaken from 13 to 15 March 2024.

1.1 Project Description and Status of Construction

The EnergyConnect Project is being delivered by Secure Energy on behalf of Transgrid and consists of the 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.

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.

EnergyConnect 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 following sections:

- 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 audit) 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
- SA section, which extends from Robertstown to the SA/NSW border.

TransGrid has two separate environmental planning approval applications for the sections within NSW these are for the:

- NSW – Western Section (Application Number SSI 10040)
- NSW – Eastern Section (Application Number SSI 9172452).

This Independent Environmental Audit covers the works on the western section under SSI 9172452.

The Project works involve the construction of the electricity transmission lines and associated access infrastructure, including:

- Establishment and operation accommodation camps
- Establishment other ancillary facilities on the transmission line construction corridor outside identified heritage risk zones
- Property adjustment work including adjustments to property fencing
- Access points, water supply points establishment and/or use
- Construction access tracks
- Transmission line construction
- Utility adjustments and protection
- Progressive site rehabilitation and landscaping.

1.2 Audit Objectives

The objectives of this Independent Environmental Audit, in accordance with the Post Approval Audit Guidelines, were to:

1. Assess compliance against the conditions required of the Project Approval.

2. Review all relevant post approval documentation by the Project Approval(s) including an assessment of the implementation of Environmental Management Plans and Sub-plans.

3. Review compliance against other environmental licences and approvals excluding any Environment Protection Licence issued under the Protection of the Environment Operations Act 1997.

4. Review the environmental performance of the development including:

    a. A high-level comparison of actual impacts against predicted impacts as documented in the environmental impact assessment.
    b. The physical extent of the development in comparison with the approved project boundaries.
    c. Review of environmental incidents, non-compliances, and complaints relevant to the audit period.
    d. Performance against any applicable environmental policy or environmental issue identified through consultation with the relevant Regulatory Authorities.
    e. Feedback received from DPE, other Agencies or Stakeholders including the community Consultative Committee (or equivalent body if applicable) relating to environmental performance of the development.

5. Review of the status of non-compliances and recommendations made in the preceding Independent Environmental Audit.

6. A high-level assessment of the adequacy of the Environmental Management Plans and Sub-plans required by the Approval.

7. Review performance of the development against any other matters considered relevant by the auditor or the Department, considering relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

1.3 Audit Scope

The audit provides an assessment of the compliance of the project with the conditions of Project Approval SSI 10040. Note that no other relevant environmental licences or approvals were identified for this development.

The scope of this audit was developed to meet the requirements of the NSW DPE Independent Audit Post Approval Guidelines May 2020 (as specified in the Approval). The audit scope was therefore developed with consideration of:

- Requirements of the Project Approval(s);
- Relevant correspondence from DPE (provided by the Auditee);
- Inputs provided by the Stakeholders consulted as part of this IEA;
- Review of the findings of the previous IEA; and
- The Auditor's experience in relation to relevant industry practices.

1.4 Audit Period

This audit of the construction phase of the project covers the period of 11 September 2023 to 15 March 2024.

1.5 Limitations of this Report

In preparing this Independent Environmental Audit Report, Barnett and May has assessed the activities appropriate and necessary to evaluate the compliance status against the conditions contained in the Auditee's Project Approval. Barnett and May has addressed the general technical matters which might reasonably be considered to be relevant to such an assessment.

The findings of this Independent Environmental Audit are based on observations of the site, interviews with personnel nominated by the Auditee and review of the documentation provided by the Auditee. Barnett and May has relied on the accuracy and completeness of the documentation and other information provided by the Auditee.

Barnett and May can only advise based on the information provided to them and therefore cannot dismiss the possibility that compliance or environmental performance issues, other than those presented in the report existed at the time of this Audit.

The audit findings presented in this report are professional opinions based solely upon Barnett and May's visual observations of the site, and upon Barnett and May's interpretation of the documentation reviewed, interviews and conversations with personnel nominated by the Auditee, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated. Opinions presented in this report apply to the site's conditions and features as they existed at the time of the audit, and those reasonably foreseeable. They necessarily cannot apply to conditions and features which Barnett and May is unaware of and has not had the opportunity to evaluate. This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation.

2. Definitions

Acronyms	Description
AQMP	Air Quality Management Plan
ASS	Acid Sulphate Soils
BCA	Australian Building Codes
BCS	Biodiversity, Conservation and Science Directorate (DPE)
BMP	Biodiversity Management Plan
CCS	Community Consultation Strategy
CEMS	Construction Environmental Management Strategy
CAQMP	Construction Air Quality Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CPTMP	Construction Pedestrian and Traffic Management Plan
CWMP	Construction Waste Management Plan
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DECC	Department of Environment and Climate Change (now DPHI)
DPE	Department of Planning and Environment (Now known as DPHI)
DPHI	Department of Planning, Housing and Infrastructure (formerly the Department of Planning and Environment / Department of Planning, Infrastructure and Environment)
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A	Act Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
ER	Environmental Representative
ESD	Ecological Sustainable Development
HMP	Heritage Management Plan
IEA	Independent Environmental Audit
ICNG	EPA Interim Construction Noise Guideline
NVNP	Noise and Vibration Management Plan
OEH	NSW Office of Environment and Heritage
PEC	Project EnergyConnect
SSD	State Significant Development
TfNSW	Transport for New South Wales

3. Auditor Certification

Independent Audit Certification Form	
Development Name	EnergyConnect Project (NSW Eastern Section)
Application Number	SSI 9172452
Description of Development	High Voltage Electricity Transmission Line
Development Address	Southwestern NSW
Proponent	Transgrid
Title of Audit	EnergyConnect PEC East March 2024 Independent Environmental Audit
I certify that I have undertaken the independent audit and prepared the contents of the attached independent audit report and to the best of my knowledge: *• The audit has been undertaken in accordance with relevant approval condition(s) and in general accordance with* *the auditing standard AS/NZS ISO 19011:2011 and in general conformance with the DPE's Independent Audit Post Approval Requirements (May 2020).* *• The findings of the audit are reported truthfully, accurately and completely;* *• I have exercised due diligence and professional judgement in conducting the audit;* *• I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;* *• I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;* *• I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);* *• Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and* *• I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.* *Note.* *a) The Independent Audit is an 'environmental audit' for the purposes of section 122B (2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000.* *b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty 5 years imprisonment); sections 307A, 307B and 307C (False or misleading applications/information/documents—maximum penalty 2 years imprisonment or $22,000, or both).*	
Signature	
Name of Lead/Principal Auditor	Ken Holmes
Address	49 Coba Point, Berowra Waters, NSW
Email Address	ken@baeckea.com.au
Auditor Certification (if relevant)	Exemplar Global 14065
Date	13 June 2024

3.1 Audit Details

Table 1 - Audit Details

Audit Title:	**EnergyConnect (NSW – East Section) March 2024 Construction Phase Independent Environmental Audit**
Site:	EnergyConnect (NSW – East Section)
Client Contact:	Rebecca Walker-Edwards
Position:	Environmental Manager
Client:	Transgrid
Client Address:	Level 19, 83 Clarence St Sydney NSW 2000
Client Phone Number:	+61 420974540
Client Email:	Rebecca.walker-edwards@elecnor.es
Auditor:	Ken Holmes (Certified Lead Auditor)
Auditor's Telephone:	0438 046 261
Auditor's Email:	ken@baeckea.com.au
Date of Audit Commencement:	13 March 2024

4. Audit process

4.1 Audit Guidelines

This audit report has been prepared in accordance with the 'Independent Audit Guideline, May 2020 as required by the project approval and specifically with the audit frequency specified in that edition of the audit guidelines. For consistency with current audit scopes, this audit also satisfies the general scope specified in the current edition of the DPE Independent Audit Guidelines and the and requirements of the Independent Audit Guidelines May 2020 (DP&E, May 2020)

Table 2 lists key requirements from the Audit Guidelines, the relevant Section of the Guidelines which references the requirement and indicates where each is addressed in this report.

Table 2 - Post Approval Audit Guidelines

Section	Independent Audit Report Requirements	Addressed
4.1	**Version Control** 1) the application number of the project; 2) each version or revision number of the report; 3) the date on which the report was prepared and issued to the Department; and 4) the title and name of the person who certified the Independent Audit Report.	Section 3 Page iii Page iii Section 3.1
4.2	**Contents**	
4.2.1	**Introduction** – a brief overview of the audit including: 1) background of the project; 2) the audit team (including qualifications and experience); 3) the objectives of the audit; 4) the audit scope; and 5) the temporal period covered by the audit.	Section 1.1 Section 4.3.1 and Appendix E Section 1.2 Section 1.3 Section 1.4
4.2.2	**Audit Methodology** 1) documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s); 2) how the audit scope was developed; 3) a summary of the audit process adopted to determine the compliance status and assess if documents are adequate; 4) site personnel interviewed including their name and position title (and including if access was not granted or possible with any required personnel and why); 5) details of site inspections undertaken (including any areas where access was not granted or possible and why); 6) a summary of the consultation undertaken; and 7) meanings of compliance status descriptors used, as set out in this document.	Appendix C Section 1.3 Section 4 Section 4.5.3 Section 4.5.2 Section 5 Section 4.6
4.2.3	**Audit Findings** 1) a list of the approvals and documents audited; 2) a summary of the assessment of compliance i.e. comparison between the total number of compliance requirements and any non-compliances identified during the reporting period. Graphics can be used to summarise project performance in relation to compliance requirements;	Appendix A Section 6.1
	3) a summary of any notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period;	Section 7.3

Section	Independent Audit Report Requirements	Addressed
4.2.3	4) exception reporting of all non-compliances identified during the audit period. Details must include the relevant consent condition, the condition reference number, a unique non-compliance identification number, details of the non-compliance and the auditor's recommended actions that are proposed to be taken or have been taken to address the non-compliance;	Section 6.2
	5) a brief discussion or table of the status of actions arising from previous audits and the progress or outcomes of each action. Details must include the source of the action, reference (condition number), action proposed, proposed completion date, the status (date completed, if relevant) and the action complete.	Section 7.6
	6) a brief discussion of whether the Environmental Management Plans, Sub-plans and compliance documents are adequate, implemented and whether there are any opportunities for improvement;	Section 7.5
	7) a discussion of other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance;	Section 7.9
	8) documentation of any feedback received as a result of consultation undertaken with the Department, and other agencies or stakeholders including the community and Community Consultative Committee for the audit and the outcomes of this consultation;	Section 5
	9) a summary of complaints, and the adequacy of the response to, and management of complaints;	Section 7.2
	10) details of any incidents (including any enforcement action by any agency) and the adequacy of the response to, and management of such incidents;	Section 7.1
	11) an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the Environmental Planning and Assessment Act 1979;	Section 7.8
	12) evidence collected through site inspections undertaken during the audit;	Appendix A
	13) evidence to support compliance assessment provided by the personnel interviewed during the audit;	Appendix A
	14) a brief discussion of any continual environmental management improvement opportunities identified as part of the audit; and	Section 6.2
	15) key strengths of the development's environmental management and performance identified by the auditor.	Section 7.4
4.2.4	Recommendations and opportunities for Improvement	Section 6.3
4.2.5	Appendices 1) a completed Independent Audit Table with all relevant conditions of consent, identifying each requirement, compliance status assessed, documenting verified evidence and providing recommendations for any non-compliance that is identified;	Appendix A
	2) a copy of documentation from the Planning Secretary agreeing to the auditor and any technical specialist(s);	Appendix C
	3) documentation detailing consultation with the Department, and other agencies or stakeholders including the community and Community Consultative Committee;	Appendix D
	4) completed and signed Independent Audit Declaration Form(s);	Section 3
	5) any reports prepared by the agreed technical specialist(s), as required; and 6) site inspection photographs.	Not required Appendix B

4.2 Overview

The audit process and methodology are summarised in this section, and comprised the following key undertakings:

- Preliminary planning activities;
- Review of information and preparation of a compliance register (audit protocol / checklist);
- Site inspection and interviews;
- Opening meeting;
- Review of relevant records;
- Review of additional information provided after the site inspection; and
- Preparation of this audit report.

4.3 Preliminary activities

Off-site planning for the site audit comprised:

- Initial discussions with client representative, to organise the site inspection and access to audit documentation;
- Update the audit compliance checklist;
- Completion of a project specific Risk Assessment;
- Review of online information;
- Submission of a preliminary document / record request; and
- Consultation with relevant agencies.

4.3.1 Approval of audit teams

Transgrid sought the Secretary’s endorsement for the audit team to undertake this Independent Environmental Audit. The Secretary approved the appointment of the Auditor (Ken Holmes) on 5 December 2023 (Appendix C).

4.3.2 Consultation with Agencies

The Auditor consulted with a wide range of agencies and the Registered Aboriginal Parties (RAPs). Emails were initially sent to each of the above agencies advising them of the audit and the scope of the audit and inviting them to provide comments/requirements or specific environmental issues they required the audit to target. Details of the responses from each group / organisation are provided in Section 5 with the Auditor’s findings in relation to the issues raised in Section 7.9.

4.4 Information Review and Compliance Register

Prior to the site inspection the Auditor prepared a detailed audit checklist (spreadsheet) that was used to assess and track compliance. This spreadsheet formed the basis of the compliance register presented in Appendix A of this report.

4.5 Site audit

The site inspection component of the audit was undertaken on 13 – 15 March 2024.

4.5.1 Opening Meeting

The opening meeting was held and attended by the following personnel:

- Rebecca Walker-Edwards – Approvals Manager
- Sarah Klocke – Environmental Advisor
- Peter Haton - Transgrid
- Andrew Scott - Transgrid
- Ken Holmes (Lead Auditor)

Introductions were made, and the purpose and scope of the audit was outlined. An explanatory presentation was given to summarise the overall audit process. That is, a site inspection, site interviews and detailed review of records to identify compliance with the approval conditions relevant to the current operations at the site.

4.5.2 Site Inspections

The site inspection included observation of:

- Site access and security;
- Typical areas of the transmission line easement cleared of vegetation;
- Tower construction sites on the easement;
- Creek crossings;
- Soil and mulch stockpile areas;
- Surface water management infrastructure;
- Erosion and sediment controls;
- Accommodation Camps;
- Office and parking facilities;
- On-site maintenance facilities;
- Hazardous Materials Storage;
- Waste storage facilities; and
- Equipment Laydown areas.

4.5.3 Site Interviews

Audit interviews comprised of a series of meetings with:

- Rebecca Walker-Edwards – Environmental Manager
- Peter Haton - Transgrid
- Sarah Klocke – Deputy Environmental Manager

4.5.4 Closing Meeting

The closing meeting was held at the completion of the site inspection and attended by the following personnel:

- Rebecca Walker-Edwards – Environmental Manager
- Sarah Klocke – Deputy Environmental Manager
- Peter Haton - Transgrid
- Andrew Scott - Transgrid
- Ken Holmes (Lead Auditor)

Preliminary audit findings were presented and tasks and timeline for completion of the audit agreed.

4.5.5 Document Review

Compliance related documents that were not available prior to were requested to be provided following the audit. The Auditee's personnel assisted with the provision of documentation following the audit, through secure file transfer mechanisms. The key documents reviewed during this audit are listed in the Compliance Registers against specific conditions.

4.6 Reporting

The compliance register was completed using notes and observations recorded during the site inspection / interviews and review of appropriate documentation. The completed compliance register is presented in **Appendix B**. A summary of the non-compliances identified during this audit are provided in Table 6. The audit criteria used to determine compliance for this audit is defined in Table 3.

Table 3 - Compliance Assessment Matrix

Assessment	Criteria
Complies	Compliance The site complies with the requirements of applicable pre-operational Consent Conditions. A judgment made by an auditor that the activities undertaken, and the results achieved fulfil the specified requirements of the audit criteria. While further improvements may still be possible, the minimum requirements are being met.
Non-Compliance	Non-Compliance Clear evidence has been collected to demonstrate the requirement has not been complied with and is within the scope of the audit. Site displays little or no evidence of compliance with the requirements of the regulatory documentation. Note: Where the auditor has not been able to collect enough verifiable evidence to demonstrate that the intent and all elements of the requirement of the regulatory approval have been complied with within the scope of the audit. In the absence of enough verification, the auditor may in some instances be able to verify by other means (visual inspection, personal communication, etc.) that a requirement has been met. In such a situation, the requirement should still be assessed as not verified. As the condition cannot be verified it is treated as a non-compliance.
Not Triggered	Not Applicable / Not Triggered The respective condition / requirement was not activated within the scope of the audit.
Noted	A statement or fact, where no assessment of compliance is required.

Risk levels for each non-compliance identified have been assessed in accordance with Table 4.

Table 4 - Risk Assessment Matrix

Risk Level	Description
High	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
Medium	Non-compliance with: • potential for serious environmental consequences, but is unlikely to occur; or • potential for moderate environmental consequences but is likely to occur.
Low	Non-compliance with: • potential for moderate environmental consequences, but is unlikely to occur; or • potential for low environmental consequences but is likely to occur.
Administrative non-compliance	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).

5. Stakeholder Consultation

Table 5 provides a summary of the Stakeholder Consultation undertaken by the Auditor.

Table 5 - Summary of Stakeholder Inputs

Department	Contact	Stakeholder Comments	Auditor Comments
NSW Department of Planning, Housing, and Infrastructure	Katrina O'Reilly	NSW Planning would like the below areas to be focused on: • Implementation of commitments in all management plans. • Erosion and sediment control measures and management. • Tracking of areas disturbed/cleared vs approved. • Adequate approvals for access roads/interfaces with the roads authority. • OOHW management and communication with neighbours. • Aboriginal and European site/s management and protection. • Threatened species management and protection. • Fire and emergency controls, management and prevention. • Complaints register management and actions. • Assessment of actual impact vs EA predictions.	All areas specified by DPHI have been reviewed during this audit: 1. All management plans were reviewed (refer to Appendix A). The commitments in the plans were generally being implemented, however several instances of non-conformance with Heritage Management Plan (clearing within a PAD and destruction of an artifact) and Biodiversity Management Plan (cleaning of equipment). 2. Erosion and sediment controls observed were of a high standard and installed in accordance with the relevant plans. 3. During the site inspection, access tracks and cleared works areas were inspected. No obvious tracking or clearing outside of approved areas was observed. For further information please refer to the Auditors response to BCD's comments below. 4. The required road access approvals were in place. 5. No out of hours works was non-compliances were identified. 6. Two Aboriginal Heritage incidents were reported during this audit period. 7. Threatened species management, please refer to point 3 above. 8. Fire and emergency controls - no emergencies or fires were recorded for this audit period. All required controls were in place, however fire water tanks at the accommodation camps were not appropriately signposted and the Emergency Plan lacks appropriate plans for each accommodation camp. 9. Fifteen complaints were received during this audit period. Complaints management appears to be satisfactory, however the public reporting (on the Transgrid Website) requires improvement. 10. The assessment of actual vs predicted impacts is presented in Section 7.8 below.

Department	Contact	Stakeholder Comments	Auditor Comments
Heritage NSW	Nicole Davis	Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for the above State Significant Infrastructure. Thank you for the continued opportunity to comment on the project. In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the management of sites under the Heritage Management Plan Energy Connect (NSW – Eastern Section) Stage 1 and Stage 2 (7 February 2024) listed by site in Appendix C. including the requirements for test excavation, salvage excavation, surface collection and site conservation through fencing prior to construction works. It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any noncompliance with Conditions of Consent for the project.	The implementation of the Aboriginal Cultural Heritage Management Plan has been assessed during this Audit. The Auditor inspected typical construction works along the alignment, including those adjacent to no-go areas. Photographs in (Appendix 2) show exclusion fencing identifying a no-go area. Exclusion zones were delineated however a recommendation for improvement has regarding monitoring and maintenance of exclusion zone fencing. A review of the heritage related records indicated that where required, further survey, test excavation, assessment, salvage had been undertaken. Two heritage incidents were recorded during this audit period that represent non-compliance against the approval and non-conformances against the obligations made in the Heritage Management Plan.
Transport for NSW	Maurice Morgan	What were the findings of the last 6-month audit?	The Auditor referred TfNSW to the previous Independent Audit Report.
NSW Environment Protection Authority	Briohny Seaman	The EPA acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted
Federation Council	Susan Appleyard	Nothing to report for Federation Council of the six months from August 2023 to February 2024.	Noted
Berrigan Council	Karina Ewer	This project is not anywhere near our Local Government Area and is not expected to have any impact on our area other than possible freight movements. The concerns then are more to deal with the impacts of increased overmass transport on our local roads, particularly as freight moves from Melbourne through to the project area. Much of that traffic will pass through our Shire. I am not sure if this is the type of impacts you are looking to consider.	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Southwest Biodiversity and Conservation Division	Simon Maffei	For this audit BCS would appreciate if you could focus on the implementation of the mitigation measures documented in the Revised Biodiversity Development Assessment Report, dated 19 August 2022, in particular mitigation measure B11 which commits to creating biodiversity exclusion zones for: • identified Plains-wanderer habitat; • identified threatened flora populations; and • PCTs in disturbance area B that are not of a growth form height that would ever require management. As per management measure BD12 of the approved Biodiversity Management Plan, please ensure that all biodiversity exclusion zones for Plains-wanderer habitat, threatened flora populations, and PCTs in disturbance area B that are not of a growth form height that would ever require management have been 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.	The Auditor inspected construction areas that had been recently cleared and one area south of Lockhart (Tower 204 / Access 5067) where clearing was being undertaken. The requirements of the Biodiversity Management Plan were generally being implemented. The clearing at Tower 204 (and the easement corridor) had been cleared by ecologists from SMEC who were on-site throughout the clearing works. The SMEC ecologists were responsible for establishing the exclusion zones prior to commencement of clearing. The Auditor was provided with a copy of the clearing register (refer to Appendix 2, Condition C23). The register is a summary of clearing works undertaken and indicated that clearing undertaken do date is well below the area approved in Planning Approval for all habitat types. The register indicated that up until 30 May 2024 no Plains-wanderer habitat had been cleared and that the only threatened species habitat cleared was 0.38 hectares of Slender Darling Pea (Swainsona Murayama) habitat.

Department	Contact	Stakeholder Comments	Auditor Comments
DCCEEW Water Group	Tim Baker	The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope: • The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include: ○ Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan ○ Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan. ○ The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting. ○ Water supply availability is clearly defined for the project. ○ Water take at the site via storage, diversion, interception, or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018. ○ Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant. ○ Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from. Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.	A Soil and Water Management Plan has been prepared. The implementation of that plan was assessed during this audit. No non-compliances relating to water management were identified during the audit and there was sufficient evidence that the Soil and Water Management Plan was being implemented, both at the accommodation camps and at the tower construction sites inspected. No water access licences are required for this project. Rainwater (sediment laden) runoff is collected in on-site retention basins and used for dust suppression, all other water required is sourced from municipal supplies or from licenced bores (owned by others). The Planning Approval does not require annual reporting.

Department	Contact	Stakeholder Comments	Auditor Comments
Crown Lands	Jarrod Smith	Crown Lands did not respond to the consultation request.	Noted
Commonwealth Department of Climate Change, Energy, the Environment and Water	Sahiba Zafrin	The Department did not respond to the consultation request.	Noted
Wentworth Council	Jarrod Roberts	Council did not respond to the consultation request.	Noted
Wagga Wagga Council	David Woods	We made a submission during the previous Audit Process and did not receive feedback or any confirmation that the items we identified were addressed. To specifically address the points in your request. 1. Council has Environmental Protection Licence 6671 on the site. 2. The site has class streams located on the property and the EIS is ambiguous in identifying the streams and proximity of construction. 3. The EIS states that the minimum distance of the tower from a classified stream is >45m. Transgrid have not provided a design to Wagga Wagga City Council despite numerous requests, however the contractor has provided a design and a tower is within 45m of Boiling Down Creek.	Noted. This information has been communicated to Transgrid.
Balranald Council	General Manager	Council acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted
Edward River Council	General Manager	Council did not respond to the consultation request.	Noted
Hay Shire Council	David Webb	Council did not respond to the consultation request.	Noted
Lockhart Council	Austin Morris	Council did not respond to the consultation request.	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Murray River Council	General Manager	Council acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted
Registered Aboriginal Parties			
Bundyi Aboriginal Cultural Knowledge	Mark Saddler	Mr Saddler provided a detailed verbal submission and raised concerns regarding the lack of substantial and consistent communications from Transgrid. He also spoke to his concerns that the project was not respecting and protecting Aboriginal Culture Heritage values.	The Auditor passed on full details of the concerns raised by Mr Saddler to Elecnor and Transgrid.
Miyagan Culture and Heritage	Robert Carrol	In relation to your email pertaining to the Project Energy Connect - Eastern Section, Miyagan Culture & Heritage has had nothing to do with the project over the past 6 months, so we are unable to offer or provide any comments or concerns.	Noted
Griffith Local Aboriginal Land Council	Steve Young	I would prefer for you to visit the Griffith LALC and arrange for a time for myself and our ACH Officers to provide you with our feedback for the lack of consultation and protection of our Aboriginal Cultural Heritages and native title rights and impacts upon the environment that will have impacted our people's cultural practices.	The Auditor offered to meet via Teams or an equivalent platform. Griffith Local Aboriginal Land Council provided no further inputs.
Wagga Wagga Local Aboriginal Land Council	Lorriane Lyons	Wagga Wagga Local Aboriginal Land Council (Tara) provided a verbal submission. Their concerns are that: • RAPs from out of area in their area doing survey. • No formal notification of incidents in their area.	The Auditor passed on full details of the concerns raised by WWLALC's to Elecnor and Transgrid.
Dareton Local Aboriginal Land Council	Pam Handy	This RAP did not respond to the consultation request	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Murray Lower Darling Rivers Indigenous Nations	Rene Woods	This RAP did not respond to the consultation request	Noted
Barkandji Native Title Group Aboriginal Corporation	Derek Hardman	This RAP did not respond to the consultation request	Noted
Balranald Local Aboriginal Land Council	Louise Murray	Balranald Local Aboriginal Land Council acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted
Deniliquin Local Aboriginal Land Council	Rose Dunn	This RAP did not respond to the consultation request	Noted
Hay Local Aboriginal Land Council	Ian Wood	This RAP did not respond to the consultation request	Noted
Narrandera Local Aboriginal Land Council	Warren Ingram	This RAP did not respond to the consultation request	Noted
Sandhills Artefacts	Michael Lyons / Aloma Simpson	Sandhills Artefacts acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted
Muragadi Heritage Indigenous Corporation	Jesse Johnson	This RAP did not respond to the consultation request	Noted
Merrigarn	Shaun Carrol	This RAP did not respond to the consultation request	Noted
Murrabidgee Mullangari	Ryan Johnson	This RAP did not respond to the consultation request	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Nari Nari Tribal Council	Tara Dixon	This RAP did not respond to the consultation request	Noted
Balranald Mutthi Mutthi Traditional Owners	Kaleana Reyland	This RAP did not respond to the consultation request	Noted
Barkindji Maraura Elders Environment Team Limited	Arthur Kirby	Barkindji Maraura Elders Environment Team Limited acknowledged receipt of the consultation request, however, did not provide any further inputs.	Noted
Riverina Murray Regional Alliance	John Fernando	This RAP did not respond to the consultation request	Noted
Hay Aboriginal working party	Ronald Goulding	This RAP did not respond to the consultation request	Noted
Yalmambirra	No contact provided	This RAP did not respond to the consultation request	Noted
Kureinji Nation	Michael Carter	BMEC did not respond to the consultation request	Noted

Department	Contact	Stakeholder Comments	Auditor Comments
Individual Registered Aboriginal Parties	Roley Williams Cheryl Penrith Cherokee Dixon Tiem Wilson Jermaine Dixon Mabel Fitzpatrick Kerrie Parker Richard Dixon Jamie Woods Sissy Petit Havea Terrance Singh Dalas Togo Singh Zakk, Togo Singh Jed Petit Alvira Wighton Alice Petit Marie Murray Edward Murray Smith Daryl Singh	These RAPs did not respond to the consultation request	Noted

6. Statutory Compliance and Recommendations

Compliance with the Conditions of Consent have been reviewed by assessing compliance against the various documentation related to project approval, as listed in section 2.2 of this report. The Compliance Register presented in Appendix A provides a detailed review of the compliance status of the site, including recommendations to address non-conformances.

6.1 Summary of Compliance Status

A summary of compliance with pre-operations statutory requirements is provided in Table 6 - Summary of Statutory Compliance. The number of conditions include sub-clauses within each approval document.

Table 6 - Summary of Statutory Compliance

Approval/ Licence	No. of Conditions	Compliant	Non-Compliant	Noted	Not Triggered
Project Approval 9172452	**166**	**127**	**6**	**31**	**12**

6.2 Non-Compliances and other recommendations

Non-compliances identified during the site inspection, interviews and document reviews are recorded in detail in the Compliance Registers in **Appendix A** and are summarised in Table 7. Recommendations have been made to address all identified Non-Compliances and Observations (recommendations for improvement).

Table 7 - Statutory Non-Compliances and Observations

No.	Condition	Finding	Recommendation	Risk Level
Project Approval SSI- 22338205				
S2 A13	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).	Following a complaint (1 December 2023), Transgrid did not report a complaint received to the ER on the day it was received. DPHI was advised of this non-compliance on 22 December 2023.	Ensure that the ER is notified on the day when a complaint is received.	**Administrative non-compliance**
S2 C28b	The Proponent must: b) implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items and PADs within the development area.	Two incidents relating to protection of Aboriginal Heritage were recorded during this audit period. On 24 January 2024, grading works occurred on the access track between Towers 131 and 132 on the Line 5 alignment where an isolated artefact, PEC-E-75 had been previously recorded. The work was undertaken in an area that was not the subject of a Land Disturbance Permit. A detailed investigation was undertaken by Elecnor. On 4 or 5 March 2024 work (leveling the top 50 – 80mm of soil) on an access track in PAD 29 occurred. This incident is under investigation at the time of preparation of this audit report.	A detailed investigation was undertaken in relation to the January 2024 incident, and mitigation measures implemented. No additional actions have been recommended. Following completion of the investigation into the March incident, review all management plans and procedures related to heritage management and protection and implement all recommendations from the investigations.	**Medium**

No.	Condition	Finding	Recommendation	Risk Level
S2 C45	Prior to commencing construction, the Proponent must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development…..	The Emergency Plan has been prepared but was not available on the project website at the time of the site inspection. Hard Copies of the plan were located at each camp. The plan is generally consistent with the requirements of the relevant guidelines. SecureEnergy provided the RFS with a copy of the plan and requested input from the RFS. It is noted that the Emergency Plan (Section 1.6 Availability of the plan) states that the Emergency Plan will be available on the website. The plan was not available at the time of this IEA.	Upload the Emergency Response plan to the Transgrid Website.	**Administrative non-compliance**
S2 C45h	Prior to commencing construction, the proponent must develop and implement and comprehensive Emergency Plan and detailed emergency procedures …… The plan must: h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);	Appendix B, titled "Asset protection zone", of the Emergency Plan provides aerial photographs of each Camp. The location of the fire water tanks (or any other infrastructure) is not shown. The lack of detail could (infrastructure) could impact the rapid identification of the location of firefighting equipment and water storage.	Update the plans in Appendix B of the Emergency Plan to include plans of each camp site showing the site infrastructure and the location of firefighting water supply tanks.	**Administrative non-compliance**
S2 C48	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 Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Waste records were not made available to the Auditor, therefore compliance with this Condition could not be verified.	Prepare a register of key compliance documentation needed to demonstrate compliance with the Project Approval and maintain those records.	**Administrative non-compliance**

No.	Condition	Finding	Recommendation	Risk Level
S2 C49	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 records were not made available to the Auditor, therefore compliance with this Condition could not be verified.	Prepare a register of key compliance documentation needed to demonstrate compliance with the Project Approval and maintain those records.	Administrative non-compliance

No.	Condition	Finding	Recommendation	Risk Level
Observations and Recommendations for Improvement				
S2 C16	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);	Appropriate erosion and sediment (surface water management) controls were in place at all sites inspected during this IEA. Routine environmental inspections are undertaken (weekly) and these are recorded on standard checklists. An external ERSED specialist undertakes additional inspections and provides advice to the project. The management of erosion and sediment control is being undertaken in accordance with the approved management plan. Sediment tracking onto public road from the Camps (• Significant sediment tracking on Kidman Way from the camp) was observed and while the Auditor understands that those roads are swept (mechanical sweeper) at least weekly, that sediment accumulation and therefore dispersion as dust or sediment during rain events can occur. It is noted that the weekly environmental checklist includes confirmation of the operation and maintenance of vehicle wash facilities and other devices including shaker / rumble grids. A recommendation for improvement has been provided.	In order to minimise the tracking and sediment and mud onto sealed public roads from major site access points and camps, it is recommended that: 1. The procedure for vehicle washdown, including heavy vehicles, be reviewed with the aim of reducing the tracking of sediment for vehicles that have not been cleaned onto public roads. 2. Develop a standard approach to the assessment of sediment accumulation at site access points and provide a trigger for road sweeping based on sediment load. Consideration be given to the installation of shaker / rumble grids at all significant site access points, including construction camps where construction traffic accesses public roads.	**Observation / Recommendation for Improvement**

No.	Condition	Finding	Recommendation	Risk Level
S2 C23b	The Proponent must: 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.	Detailed clearing procedures have been documented and implemented as per the Biodiversity Management Plan. Pre-clearing surveys are undertaken to identify all trees to be removed, habitat trees and areas to be protected (for biodiversity and cultural heritage purposes). Clearing is being undertaken by a clearing contractor and is guided by GPS and GIS systems with live data available to the clearing crew. A clearing register is maintained by the Environment Manager. Clearing and Ground disturbance permits are held by the clearing contractor). The permit is signed by the project ecologist and includes key ecological items including: • Exclusion Zones • Preclearing ecologist inspection • Requirement for a fauna spotter • Requirement for nest boxes • Retention of habitat features Subsequent review of the clearing limits at Tower 204 indicated that the stockpile located behind the exclusion fencing was not in the area of sensitive habitat requiring protection. However, the Auditor is concerned that the actions of the clearing contractor and lack of proactive intervention by the ecologists responsible for establishing the no-go areas could result in inadvertent impacts on habitat.	Opportunity for Improvement – Review and update the induction / training of SecureEnergy and Contractor clearing supervisors and the specialist ecologists to ensure that they understand: 1.the meaning and significance of site all boundary markings (e.g. survey pegs). 2.The use of clearing limit and no-go area flagging. 3.No clearing, parking of vehicles or stockpiles are permitted in any area that is identified as a no-go area by fencing, flagging or signage.	**Observation / Recommendation for Improvement**

No.	Condition	Finding	Recommendation	Risk Level
S2 C23b	The Proponent must: 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.	During the inspection of construction areas, including recently cleared areas, the Auditor observed (refer to Photograph 6) that in • Clearing through sensitive areas appeared to be appropriately controlled and there was no evidence of obvious exceedances of clearing limits. • Coloured (green) flagging is used to identify no-go areas – in all locations visited, much of the flagging had fallen over / needed reinstatement to ensure that the no-go areas are clearly marked. • Some boundary pegs / posts (white) were missing / fallen over and while there did not appear to any encroachment on areas outside of the approved site boundaries, those boundary markers should be reinstated.	The boundary and no-go area fencing / flagging in all active construction areas are inspected weekly and all boundary pegs/ no-go area flagging is maintained, and clearly visible to all construction personnel.	**Observation / Recommendation for Improvement**
S2 D12	Before the commencement of construction until the completion of all rehabilitation required under this approval, the Proponent must: a) make the following information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this approval) publicly available on its website: (vi) a record of complaints, which is to be updated on a monthly basis;	The complaints register is provided on the Transgrid website. The complaints documented, as presented by Transgrid often: • Lack clear descriptions of the nature of the complaint. • Do not provide details on the outcomes of investigations undertaken. • Do not provide follow-up information (committed to in the actions presented) • Do not indicate if the complaint has been closed and when that occurred.	Ensure that the complaints register a provides clear, completed and accurate record of all complaints received, including: • Clear descriptions of the nature of the complaint. • Complete details on the outcomes of investigations. • follow-up information (committed to in the actions presented) • Indicate if the complaint has been closed and when that occurred.	**Observation / Recommendation for Improvement**

7. Independent Audit Post Approval Requirements

This audit focused on the compliance requirements established by the Conditions of Approval. This section of the report covers the specific requirements contained in the DPE Guidelines.

7.1 Summary of Environmental Incidents

Two reportable incidents were reported during this audit period:

- On 24 January 2024, grading works occurred on the access track between Towers 131 and 132 on the Line 5 alignment where an isolated artefact, PEC-E-75 had been previously recorded. The work was undertaken in an area that was not the subject of a Land Disturbance Permit. The works resulted in the destruction of a heritage artifact. A detailed investigation was undertaken by Elecnor.
- On 4 or 5 March 2024 work (leveling the top 50 – 80mm of soil) on an access track in PAD 29 occurred. This incident was under investigation at the time of preparation of this audit report.

7.1.1 Incident Response Assessment

The system implemented as documented in the EMS includes:

- Incident reporting;
- Implementation of immediate response actions;
- Incident investigation;
- Development of corrective and preventative actions;
- Reporting (internal and external); and
- Incident record management.

The Auditor was not provided with a copy (or extract from) the project Incident Register and has therefore been unable to assess the implementation of the incident reporting procedures.

7.2 Summary of Complaints

Fifteen complaints were recorded by the Proponent over the Audit Period. These are summarised in Table 8.

Table 8 - Summary of Complaints

Date	Contact Method	Nature of Compliant	Description	Action Taken
Sept 23	Email.	Radio Interference	The initial complaint was regarding bad language being used by contractors on channel 40. After phone calls by both Transgrid and SecureEnergy it was realised that the complaint was more about the use of Channel 14 - a common channel used by local farmers in Lockhart. The complainant wanted SecureEnergy to cease using any channels between 1 and 30.	Complaint investigated. SecureEnergy does not use Channels 14, 15 and 17, but not Channel 40. Discussions with the Construction Team regarding radio etiquette on any channel were undertaken and reinforced in daily prestarts. Secure is giving consideration to using Channels 30-40 instead. The Land and Property Access Manager contacted some landholders in the area to see what channels are not regularly used by the farmers. The Construction Delivery Manager has agreed to change Channel 14 to a less used channel and undertook to investigate options. The complainant was contacted to outline actions. SecureEnergy has contacted several landholders to discuss the use of Channel 14, the general reply regarding the UHF use was that use of Channel 14 is acceptable providing the radio is used professionally for short discussions.
Sept 23	Telephone	Access to private property	Landholder was concerned that site crews failed to close two gates on his property with one being a property gate.	Complaint investigated using IVMS data from vehicles. The last contractor to access his property was completing geotechnical testing. The data showed both vehicles involved stopped for an extended period at the time at the property boundary and between properties indicating they would be opening and closing gates in that time frame. SEJV is still awaiting two more subcontractor IVMS records to show their movements on the day. SecureEnergy has provided an update to the landholder.
Sept 23	Telephone	Traffic (speeding)	The landholder was concerned and considered this a near miss. The landholder was very upset by this near miss as a similar incident occurred in the past killing someone close to her.	The landholder has been contacted to update them on our actions. The incident has been raised with the SecureEnergy Project Manager who has reported the incident to the subcontractor's management. SecureEnergy is awaiting feedback from its subcontractor on the actions they will put in place to address the complaint and what they will do to ensure their staff comply with speed limits along this road. SecureEnergy is Investigating reducing the speed limit on Boiling Down Road for all project vehicles.

Date	Contact Method	Nature of Compliant	Description	Action Taken
Nov 23	Email from landholder lawyers	Weeds (cleaning of plant and equipment)	Landholder concerned that vegetable matter and soil on plant and equipment could fall from the machine whilst travelling through their property and may introduce unwanted species of weeds & grasses onto the property.	Equipment did not enter the property and was returned to the SecureEnergy yard for cleaning. No attempt to access the property after additional cleaning of the equipment was made. Further actions taken were: • Review of landholder Property Management Plan. • New Induction created for access to private property
Nov 23	Email	Clearing / Biodiversity	The complainant has questioned the loss of large trees that have been felled in the Brookong Forest near Lockhart and wants to know why this forest has been chosen as a location for the project. The complainant also states they have experienced emotional distress as a result of this action.	Transgrid has responded to the Complainant by explaining: • That the selection process for the EnergyConnect corridor and associated vegetation clearing at Brookong State Forest is in line with all relevant environmental approvals for the project • There are mitigation measures in place to minimise impact to fauna in the area.
Nov 23	Letter from landholder solicitor.	Weeds (cleaning of vehicles)	The complainant found an excavator covered in foreign plant matter and soil on their property, raising concerns about biosecurity.	The project team investigated procedures to identify where improvements can be made with regards to ensuring appropriate processes are followed. Internal investigations indicated greater care needs to be taken when cleaning equipment. Additional training for Project operators regarding plant clean down procedures was undertaken at the Lockhart washdown site.
Nov 23	Verbal	Works of private property	The landholder's harvesting operation was impeded by construction activities, resulting the landholder standing down (sic) the harvest.	Investigations into the incident and discussions with the landholder to resolve the issue were undertaken. The investigation indicated the possible factors that contributed to the incident were: • Inadequate communications • Expediting daily productions • insufficient scrutiny by Land Access Team and lack of briefing during hand over of supervision roles. These matters have been communicated internally through discussions between Supervisors and Managers, and to the general workforce at prestart meetings.
Jan 24	Verbal	Works of private property	Landholder concerned about the project accessing the works through their property.	The landholder was informed that Transgrid and Elecnor Australia have the right to access the property and have provided formal written notification as to construction activities. The landholder was also notified that the Land and Property Access Manager was still his point of contact.

Date	Contact Method	Nature of Compliant	Description	Action Taken
Feb 24	Email	Cultural Heritage	Unauthorised clearing of access track near structure 131. The clearing occurred prior to surface collection, or an exclusion fence being installed. This resulted in the destruction of a previously identified artifact.	The ACHAR states that the artefact in question was listed for potential destruction. SecureEnergy understand that (in accordance with the obligations documented in the EIS that the project is not required to inform RAPs of non-compliance or incidents. NSW DCCEEW were notified of the breach. The RAP was contacted and advised that on 1 February that RAPs were invited to attend the site the day after the incident. Several RAPs did attend during this period. The RAP sent a letter on the 4 February outlining his dissatisfaction with the communications from the project team.
Feb 24	Email	Cultural Heritage	Unauthorised clearing of access track near structure 131. The clearing occurred prior to surface collection, or an exclusion fence being installed. This resulted in the destruction of a previously identified artifact.	A RAP requested a meeting to discuss the incident. 16/2 – EnergyConnect' s Environmental Approvals Manager undertook to meet with the RAP on 22 or 23 Feb to discuss the issue. The complaint was subsequently escalated to Transgrid.
Feb 24	Email	Cultural Heritage	Unauthorised clearing of access track near structure 131. The clearing occurred prior to surface collection, or an exclusion fence being installed. This resulted in the destruction of a previously identified artifact.	A RAP requested a meeting to discuss the incident. 16/2 – EnergyConnect' s Environmental Approvals Manager undertook to meet with the RAP on 22 or 23 Feb to discuss the issue. The complaint was subsequently escalated to Transgrid.
Feb 24	Verbal	Traffic (damage to private vehicle)	A member of the public drove into Dinawan Substation 2 site at 1.40pm today (Friday 16 February 2024) and stated they believed a rock from a truck leaving the substation had hit their white panel van. They produced a rock weighing approximately 1kg.	The driver of the van was asked to contact Elecnor Australia with more details about the incident. The health and Safety Team have taken action by re-iterating vehicle exit protocols to sub-contractors and increasing the visual inspection frequency of the road adjacent to the camp access point to identify loose debris. 19/2 – SecureEnergy contacted the community member asking for written details of the truck. Senior Change and Risk Manager investigated the sub-contractor policies to facilitate the insurance claim process if required.
Feb 24	Email	Access to Private Property.	Meeting held on 22 February with Transgrid and Elecnor Australia personnel. H189 Landholder has raised dissatisfaction with Transgrid representatives' understanding of the Property Management Plan for that property. Landholder also took offense to aggressive manner Transgrid representative showed to Elecnor Australia representatives. Landholder has requested Transgrid representative not attend any future meetings with them.	Transgrid Investigated the complaint. The landholder was contacted by Transgrid on 26 February 2024. The summary outcome from this conversation was that Elecnor land access officers are the primary point of contact – should there be a requirement for Transgrid representation at future meetings, an alternate appropriate person would be nominated.
Feb 24	Verbal	Rehabilitation (private property)	As a result of clearing and grubbing works, the landholder submitted a quote to Elecnor to do his own remediation works.	Elecnor Australia will use their own equipment to carry out the remediation works. Elecnor to organise a date with the landholder

Date	Contact Method	Nature of Compliant	Description	Action Taken
Feb 24	Telephone	Traffic	The landholder observed heritage vehicles exiting his property past his sheds even though this property has a no off easement access requirement. The landholder was concerned that if property were to go missing from his sheds, the finger could be pointed at these workers.	Workers have been advised to only use the easement. No entry signs and shut the gate signage was installed at the property as of 4 March 2024.

7.2.1 Compliant Management System Assessment

The complaints management system as documented in the EMS includes:

- Complaint reporting;
- Communication protocol (initial and on-going contact with complainants);
- Compliant investigation;
- Development of corrective and preventative actions (where appropriate);
- Reporting (internal and external); and
- Complaint record management.

While the system as described in the EMS is considered appropriate for the project, the Auditor was not provided with an extract from Consultation Manager database and has therefore been unable to assess the implementation of the complaint management and reporting procedures.

Table 8 above has been based on the complaints register located on the Transgrid website. The complaints documented, as by presented by Transgrid often:

- Lack clear descriptions of the nature of the complaint.
- Do not provide details on the outcomes of investigations undertaken.
- Do not provide follow-up information (committed to in the actions presented)
- Do not indicate if the complaint has been closed and when that occurred.

A recommendation has been provided in Section 6.2 of this report.

7.3 Summary of Notices

SecureEnergy reported that no compliance related notices, orders, penalty notices or prosecutions were issued to the project during the audit period.

7.4 Project Environmental Management System

The project operates in accordance with the Construction Environmental Management Plan (CEMP) that was prepared in accordance with the requirements of the Project Approval.

The Auditor has concluded that the degree of compliance identified in this audit indicates the CEMP is appropriate and is being generally being implemented. The Auditor notes that access to documentation during the evidence assessment stage of the audit was problematic, resulting in delays to the completion of this report.

7.5 Implementation of the Environmental Management Plan and Sub-plans

The Conditions of Approval required the preparation and implementation of the following management plans for the construction phase of the project:

- Construction Environmental Management Plan
- Biodiversity Management Plan
- Soil and Water Management Plan
- Heritage Management Plan
- Traffic and Transport Management Plan
- Noise and Vibration Management Plan

During the document review phase of the project the contents of each of the plans were reviewed and were found to reflect the requirements of the Approval. All Plans and Programs adequately identified the relevant project risks and proposed appropriate risk management controls.

7.6 Status of Previous IEA Findings

The previous Independent Environmental Audit was undertaken by Trigalana Environmental, and the audit report was finalised on 10 November 2023.

Table 9 – Status of previous IEA Findings.

Ref.	September 2023 Audit Finding	September 2023 Audit Recommendation	Auditee Response	Status
A2- R1	Condition C44 requires the 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. A water supply tank has been installed at Camp 2 as required by this condition. It was not clear to the auditor that the tank was the water supply tank as required by this condition.	Install appropriate signage so emergency services can quickly identify the water supply tank in the event of an emergency. Notify RFS of the location of and access arrangements to the fire tank. Commission testing of the FRNSW suction connection with RFS equipment should also be offered to RFS to ensure effectiveness in a fire emergency.	Signage has been installed on the water supply tank. The Emergency Plan has been prepared in consultation with the local Fire Control Centre. Separately, SecureEnergy will notify the local Fire Control Centre (RFS) of the location of, and access arrangement to, the fire tank. Commission testing is not a requirement of the Emergency Plan; however, it will be offered as part of the notification.	Closed
A2- R2	The project is entering a high-risk period for bushfire with the Bushfire Danger Period declared for NSW on the 1st of October. Given the heightened bushfire risks across NSW due to increased fuel loads and the declaration of an El Nino in September 2023 there is a need to ensure the project is fully equipped to prevent and respond to any fire related incidents	Conduct a pre-bushfire season readiness review to ensure all obligations and commitments relating to Fire and Emergency are implemented and are compliant. It is recommended the review should focus on the activities noted in the Bushfire Management including (but not limited to): • Onsite Preparedness Activities • Firefighting water supplies and equipment • Access and egress for emergency vehicles • Emergency Response • Communication Protocols Involve suitably qualified personnel in the review as required. A record of the review should be kept.	A bushfire readiness review will occur in relation to the content and implementation of the Emergency Plan. Additionally, toolbox talks will be delivered to all site personnel.	Closed
A2- R3	The dust controls at Camp 6 are very good, and include the provision of a polymer spray to prevent dust generation of exposed areas	Consider utilising the same polymer-based dust suppression used at Camp 7 for Camp 2 and all other camp and compound sites along the PEC East alignment.	The use of polymer at Camp 2 is being reviewed as a potential management measure by the project team. If the use of polymer is considered to be required, this will be implemented.	Closed

7.7 Specialist Auditor Reports

No specialist auditor reports were required as part of this audit.

7.8 Environmental Impacts

The assessment of construction impacts against those predicted in the Environmental Impact Assessment, prepared by WSP (13 January 2022), are summarised in *Table 9*.

Table 10 - Predicted vs Actual Impacts

Category	Predicted Impact	Actual Impacts to Date
Biodiversity	The main impacts on biodiversity during construction would be: • Direct impacts on six threatened ecological communities, seven under the BC Act; two of the threatened ecological communities are listed as serious and irreversible impacts. • Direct impacts on seven threatened ecological communities listed under the (Commonwealth) Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). • Direct impacts to threatened flora species including nine threatened flora species listed under the BC Act and two serious and irreversible impacts. • Direct impacts on four threatened flora species listed under the EPBC Act. • Direct impacts to candidate threatened fauna species including six threatened fauna species listed under the BC Act with one listed as serious and irreversible impact. • Direct impacts on four threatened fauna species listed under the EPBC Act. • Impacts to threatened aquatic species, ecological communities or their habitats are unlikely. • Impacts to groundwater dependant ecosystems are unlikely • Impacts to wetlands of national or international importance are unlikely • The proposal would be unlikely to lead to a significant impact on any threatened species or their habitat, or migratory birds (and their habitat) listed under the EPBC Act	The clearing to date has occurred within the approved project footprint. Clearing records indicate that the extent of vegetation removal has to date been consistent with that predicted in the EIS.

Category	Predicted Impact	Actual Impacts to Date
Landuse	Private landowners may be impacted while construction activities are underway on or in proximity to their property, through the temporary loss of access to parts of their property, a potential loss of privacy and amenity (dust/noise/visual) impacts. Given the short duration of construction works, these potential impacts will be of limited duration. It is also expected that no residents would be required to relocate during the construction phase of the Project. All construction works along the transmission pipeline alignment will take place within the proposed construction footprint.	Construction impacts to date are consistent with those predicted in the EIA.
Hydrology and Flooding	Impacts to flooding from construction of the proposal are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities. Potential impacts would also be limited to periods of flooding, which have a low likelihood of occurring during construction on flood prone areas. Potential impacts to water quality are anticipated to be limited to temporary and localised impacts due to the progressive nature of the construction activities.	No material flooding or surface water impacts have been identified during the audit period.
Hazardous Materials	During construction, potential hazards and risks to the surrounding community or environment may be associated with: • the on-site storage, handling and transport of dangerous and hazardous goods, contaminated soil and hazardous waste • potential interaction with existing utilities potential bushfire risks • changes to emergency egress and excavation routes.	During this audit period, no bushfire or hazardous materials related incidents were recorded.
Historical Heritage	No direct impacts on the Yanga Pastoral Station Complex. A significant impact was predicted on the sheep yards in the Willows Precinct. Potential for impacts on: • survey marker • Bundure Railway Staton Nyingay Station	No impacts unapproved on heritage sites were identified during this IEA.
Visual Amenity	Across all landscape character areas, construction activities would involve the temporary mobilisation of plant throughout the proposal landscape to construct the proposal and to provide ancillary infrastructure (e.g. construction compounds and access tracks). Construction activity would be most prominent around transmission line structure footings. Vegetation removal would be required, which would mostly comprise of shrubs and groundcovers. Landform modification would be small and localised.	No impacts relating to visual amenity were identified during this IEA.

Category	Predicted Impact	Actual Impacts to Date
Aboriginal Heritage	The proposal has the potential to directly and/or indirectly impact Aboriginal sites including: • four artefact-only sites of low significance and seven with moderate significance • four artefact and hearth sites with moderate significance • one artefact scatter, hearth and modified tree site with moderate to high significance • three earth mound and hearth sites with moderate significance • five hearth-only sites with moderate significance • 15 isolated finds with low significance and five with moderate significance • five isolated finds and hearth sites with moderate significance • one midden site with moderate significance • seven modified/scar tree sites with moderate significance. The proposal also has the potential to directly and/or indirectly Potential Archaeological Deposits (PADs) including: • 23 PADs through direct impact • 16 PADs through potential direct impact.	Two incidents of unapproved impacts on Aboriginal Cultural Heritage sites or artifacts were identified during this audit period.
Soils	Construction of the proposal has the potential to result in soil erosion and impacts to land capability in the absence of adequate management measures. Key construction activities that present a risk to soils include excavation and other earth moving activities, vegetation removal and the movement of vehicles, plant and equipment within unsealed areas. The potential impact of these activities may include: • erosion of exposed soils and stockpiled materials • dust generation from • increased sediment loads entering the surrounding waterways • compaction of soils leading to impacts on drainage	No soil erosion issues were identified during the audit period. However, sediment tracking onto local roads requires on-going attention.
Contamination	Whilst areas known to be contaminated have not been identified, the assessment has identified areas of potential contamination. Construction activities potentially impacting these sites includes vegetation removal, excavation of soils, piling and dewatering activities.	To date no contamination has been encountered.
Acid Sulphate Soils	The majority of the proposal study area is identified as having a low risk of acid sulphate soils. Areas surrounding lakes and river beds are identified as potentially containing acid sulphate soils.	No acid sulphate soils were encountered during this audit period.

Category	Predicted Impact	Actual Impacts to Date
Salinity	Potential impacts from salinity can occur due to disruption of the water table (i.e. when saline groundwater rises and deposits salts in upper soil layers). Disruption can result from vegetation removal, physical barriers, or the reuse of saline soils generated by the proposal.	No salinity related impacts were encountered during this audit period.
Construction Noise and Vibration	There is the potential for concurrent construction activities occurring in proximity to sensitive receivers because of the construction of the transmission line, substation and the two main construction compounds. Based on the results of the above assessment and considering the proximity of the nearest receivers to Buronga substation and main construction compound and accommodation camp sites, the risk of notable construction impacts at the nearest receivers would be low, with concurrent noise levels anticipated to be below relevant construction NMLs.	No noise or vibration related complaints have been received during the audit period.
Construction Air Quality	The assessment of air quality impacts at these identified sensitive receivers found that the impacts to sensitive receivers would be negligible.	No air quality related complaints have been received during the audit period. No air quality impacts from construction have been identified.
Traffic and access	The increase of light vehicles and heavy vehicle movements from current traffic volume would not be expected to adversely impact the capacity and serviceability of the road network and at intersections. Heavy vehicle traffic movements would also be distributed throughout the day to minimise their impact on town centres' peak traffic activities.	No traffic impacts exceeding the predictions in the EIS have been identified. It is noted that two complaints regarding project light vehicle speeding were received during this audit period.

7.8.1 Extent of Project Operations

The original Environmental Assessment and modifications defined the proposed project boundaries. A review of current aerial imagery (Google Maps) and the Auditor's observations during the site inspection found that the construction works are confined to the approved site boundaries.

7.9 Other Matters

No other issues were identified during this IEA.

Appendix A
PEC East Project
March 2024 Independent Environmental Audit

Audit / Compliance Table

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A1	Minimise harm to the Environment	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, upgrading or decommissioning of the development.		Environment Manager - No incidents with the potential to cause material harm to the environment have occurred during the audit period.	No evidence of actual or potential material environmental harm was sighted during the site inspection.	No evidence of actual or potential material environmental harm was sighted during the site inspection. The Auditor notes that two non-compliances related to Aboriginal Heritage occurred during this audit period, one of those incidents resulted in the destruction or loss of an artifact. While this incident is not trivial, it does not, in the Auditor's opinion meet the threshold of "material harm".	Complies	
S2 A2	Terms of Approval	The Development may only be carried out: a. in compliance with this approval		Environment Manager - Three non-compliances have been reported to DPHI during the audit period. • Non-compliance with Condition A13 • non-compliance with Conditions B1 and C28 • non-compliance with Condition A13 These non-compliances were reported to DPHI.		Three non-compliances have been reported to DPHI during the audit period. Details of these non-compliances are provided under the relevant Conditions below.	Noted	
		b. In accordance with all written directions of the Planning Secretary;		Environment Manager - No directions from DPE were received during the audit period.			Not Triggered	
		c. Generally, in accordance with the EIS; and				No evidence was found that the works undertaken to date associated with SSD 9172452 has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
		d. generally, in accordance with the Development Layout in Appendix 1.		Environment Manager - While changes to the project compared to what was initially approved have been made, these changes have been subjected to Consistency Assessments and do not represent a fundamental or significant change to what has previously been approved.		No evidence was found that the works undertaken to date associated with SSD 9172452 has not been undertaken in general accordance with the EIS or the approved plans.	Complies	
S2 A3	Terms of Approval	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any strategies, plans or correspondence that are submitted in accordance with this approval;		Environment Manager - The only correspondence received from DPHI during the reporting period was the acceptance of the previous audit report and approval of the new auditor.			Not Triggered	
		b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and		Environment Manager - The only correspondence received from DPHI during the reporting period was the acceptance of the previous audit report and approval of the new auditor.			Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A3	Terms of Approval	c) the implementation of any actions or measures contained in these documents.		Environment Manager - The only correspondence received from DPHI during the reporting period was approval of the new auditor.			Not Triggered	
S2 A4	Terms of Approval	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.					Noted	
S2 A5	Terms of Approval	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.					Noted	
S2 A6	Lapse of Approval	This approval will lapse five years after the date on which it is granted unless construction has physically commenced on or before that time.					Not Triggered	
S2 A7	Evidence of Consultation	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.				Refer to specific conditions below	Noted	

SSI 9172452								
Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 A8	Staging, combining or revision of Strategies, Plans and Programs.	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);	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager – no changes to the staging of plans or strategies have occurred during this audit period. All required plans and strategies were submitted prior to this audit period.		All required plans and strategies were submitted prior to this audit period.	Noted	
		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	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager – No approval has been sought for the combining of any plans, programs, or similar documents during this audit period.		No approval has been sought for the combining of any plans, programs, or similar documents during this audit period.	Not Triggered	
		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). If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval. 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.		Environment Manager - The Secretary did not request the review of any post approval documents during this audit period.		The Secretary did not request the review of any post approval documents during this audit period.	Noted	
S2 A9	Environmental Representative	Prior to commencing the development, an environmental representative (ER) must be approved by the Secretary and engaged by the Proponent.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A10	Environmental Representative	The Secretary's approval of an ER must be sought no later than one (1) week before commencing the development.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	

SSI 9172452								
Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 A11	Environmental Representative	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 sections 2.2, 2.3, 2.4 and 3 in the *Environmental Representative Protocol* (Department of Planning and Environment, October 2018).	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - There has not been any change of ER during the audit period.		Cameron Weller of Hutchison Weller was appointed as the Independent ER. DPE approval was provided on 20/9/2022.	Complies	
S2 A12	Environmental Representative	From commencing the development, until commencing operation, or as agreed with the Secretary, the approved ER must: a) review the documents identified in conditions A22, B1, B2, C10, C45, C50 and C51, and any other documents that are identified by the 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 Secretary (if those documents are required to be approved by the 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);	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			All plans covered by Condition S2 A10 were reviewed and endorsed by the ER prior to the commencement of construction (prior to this audit period).	Complies	
		b) as may be requested by the Secretary, assist the Department in the resolution of community complaints; and		Environmental Representative (telephone interview 25/3/2024) – The ER was not required to assist in the resolution of community complaints during this audit period.		The ER was not required to assist in the resolution of community complaints during this audit period.	Not Triggered	
		c) consider any minor amendments to be made to the plans / strategies in conditions A22, C50, C51, D3, D4, D5, D6 and D7 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.					Noted	

SSI 9172452								
Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 A13	Environmental Representative	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).	Letter from Transgrid (L Fania) to DPE (M Fishburn) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of non-compliance with condition A13", dated 22 December 2023.			Following a complaint (1 December 2023), Transgrid did not report a complaint received to the ER on the day it was received. Following a complaint (1 December 2023), Transgrid did not report a complaint received to the ER on the day it was received. DPHI was advised of this non-compliance on 22 December 2023.	**Non-Compliance**	Ensure that the ER is notified on the day when a complaint is received.
S2 A14	Reasonable Costs	The Proponent must pay all reasonable costs incurred by the Department to engage a suitably qualified, experienced and independent expert(s) to review the adequacy of any strategy, plan, program or report required under this approval.		Environment Manager - DPHI has not requested compensation for the review of any plans or other documents during this audit period.		DPHI has not requested compensation for the review of any plans or strategies during this audit period.	Not Triggered	
S2 A15	Protection of Public Infrastructure	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 authority or service provider; 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.	Incident Register Complaints Register	Environment Manager - No damage to public infrastructure occurred during the audit period.		No evidence of damage to public infrastructure was identified during this audit period.	Not Triggered	
S2 A16	Demolition	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.		Environment Manager – no demolition works have been undertaken during this audit period.	No evidence of demolition works was sighted during the site inspection.	No demolition works have been undertaken during this audit period.	Not Triggered	
S2 A17	Structure Adequacy	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.	Independent Environmental Audit - SSI – 10040 – Project EnergyConnect (NSW Section), dated 21 September 2023, prepared by Trigalana Environmental.	Environment Manager – No permanent buildings were constructed during the audit period. Earthworks only occurred at the Wagga Wagga substation.	No evidence of building works for permanent structures was sighted during the site inspection.	No permanent buildings were constructed during the audit period. Earthworks only occurred at the Wagga Wagga substation.	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 A18	Compliance	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.	EnergyConnect Site Specific Induction Overhead Transmission Lines (OHTL) L5 (PowerPoint presentation) Training PowerPoint Presentations including: • Erosion & Sediment Control • Traffic and Transport Management – Western Section • Approvals • Biodiversity • Heritage • Land Access • Noise and Vibration • Soil and Water Daily Pre-Shift & Post Shift Briefing Form 5 March 2024.		The auditor attended the morning Pre-start meeting during the site inspection. During those meetings, critical issues covering safety and environment were presented.	Training materials covering all elements of the approval were reviewed. Records of training from the audit period were sighted.	Complies	
S2 A19	Operation of Plant and Equipment	The Proponent must ensure that all plant and equipment used on the site is: **a)** maintained in a proper and efficient condition.	Extracts from the project maintenance management system were sighted, including: • Daily (pre-start) check lists • Maintenance requests • Maintenance records		Camps (accommodation, storage and maintenance areas) are well maintained and organised. All plant and equipment operating (on construction areas) appeared to be operational and well maintained.	Maintenance facilities (generally for light vehicles) are located at each camp. Records of inspections and maintenance were sighted.	Complies	
		b) operated in a proper and efficient manner.				All facilities, plant and equipment sighted during the audit were operational and appeared to be well maintained.	Complies	
S2 A20	Applicability oof Guidelines	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.					Noted	
S2 A21	Applicability oof Guidelines	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.					Noted	
S2 A22	Community Communications Strategy	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. The Community Communication Strategy must: a) identify landowners for potentially impacted receivers;	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 22 March 2023.	Environment Manager - The Community Communication Strategy has been uploaded. No modifications have been made to that document during the audit period.		Section 6.1.4 identifies potentially impacted landowners.	Complies	
		b) ensure that the landowners identified in (a) are consulted during construction;				The Strategy identifies the mechanisms for stakeholder and landowner consultation.	Complies	

SSI 9172452								
Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 A22	Community Communications Strategy	c) set out procedures and mechanisms for the regular distribution of information to the wider community;	Community Communication Strategy EnergyConnect (NSW – Eastern Section), Rev 1, dated 22 March 2023.			The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
		d) establish a public liaison officer(s) to engage with the local community; and				Section 4 of the Strategy identifies the public liaison officers.	Complies	
		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.				The Strategy (Sections 8, 9, and 10) identifies the mechanisms for stakeholder and landowner consultation.	Complies	
S2 B1	Construction Environmental Management Plan	Prior to commencing 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.	Construction Environmental Management Plan EnergyConnect (NSW-Eastern Section) Stage 1 and Stage 2, Revision 2, dated 20 June 2023. Letter from DPE to Transgrid (J Fisher) titled "Construction environmental Management Plan for Stage 1 &2", dated 6 July 2023.	Environment Manager - No revisions to the CEMP have occurred during this audit period.		The current version of the CEMP is revision 2, covering the Stage 1 and Stage 2 works. The plan was approved by the Planning Secretary on 6 July 2023. The CEMP was not updated during the audit period.	Complies	
		The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1.					Complies	
	Table 1	**Required Plan**	**Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan**	**Documents Reviewed**				
		Noise and Vibration	Council			The NVMP was prepared and approved during a previous audit period.		
		Soil and Water	DPIE Water			The SWMP was prepared and approved during a previous audit period.		
		Biodiversity	BCS Council	.		The BMP was prepared and approved during a previous audit period.		
		Heritage	Heritage NSW Aboriginal Stakeholders	Agency Consultation Report EnergyConnect (NSW – Eastern Section) Heritage Management Plan (Stage 2), Revision D, dated 17 January 2024.		45860-HSE-PL-D-0119 ECE S2 HMP Rev 5 was revised and approved during this audit period. Heritage NSW approval and the consultation report were sighted.		
		Traffic and Transport	TfNSW Council	Agency Consultation Report EnergyConnect (NSW – Eastern Section) Traffic and Transport Management Plan (Stage 2), Revision F, dated 6 March 2024.		45860-HSE-PL-D-0115 ECE S2 TTMP was revised during the current audit period and has been approved (Rev 5). A copy of the TTMP and consultation report were sighted.		

SSI 9172452								
Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S3 B2	CEMP and Subplan requirements	The EMP Sub-plans must be prepared in accordance with relevant guidelines and in consultation with the relevant government agencies identified for each Sub-plan in Table 1, and include: a) a summary of relevant background or baseline data;	Independent DPE Compliance Audit SSI-9172452 – Project Energy Connect (NSW Eastern Section), prepared by Trigalana environmental, dated 10 November 2023. Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 23 January 2024. Heritage Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2024.			The Noise and Vibration Management Plan, Soil and Water Management Plan, and Biodiversity Management Plan were prepared and approved during the previous audit period. Compliance of those plans with the requirements of Schedule 3 Condition B2 was verified during the last audit. Section 3 of the revised HMP and TTMP provide a summary of baseline data / conditions.	Complies	
		b) details of: (i) the relevant statutory requirements; (ii) any relevant limits or performance measures and criteria; and (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;				Legislative requirements are summarised in Section 2.1 and 2.2 of the revised HMP and TTMP. Performance limits and indicators are not relevant to these plans.	Complies	
S3 B2	CEMP and Subplan requirements	c) any relevant commitments or recommendations identified in the EIS;	Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 23 January 2024. Heritage Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2024.			Relevant commitments from the EIS are covered in Section 2.3 of both plans.	Complies	
		d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;				Management and mitigation measures are described in Section 5 of the revised HMP and TTMP.	Complies	
		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 (ii) effectiveness of the management measures set out pursuant to paragraph d);				Monitoring and reporting measures are described in Sections 56.3 and 6.6 of the revised HMP and TTMP.	Complies	
		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;				Contingency measures are described in Section 6.8 of the revised HMP and TTMP.	Complies	
		g) a program to investigate and implement ways to improve the environmental performance of the development over time;				Section 6 of the HMP and Section 7 of the TTMP describe compliance management, that includes monitoring and reporting.	Complies	
		h) a protocol for managing and reporting any: (i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion; (ii) complaint; or (iii) failure to comply with other statutory requirements;				Section 6 of the HMP and Section 7 of the TTMP describe compliance management, that includes monitoring, inspections, audits and reporting.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S3 B2	CEMP and Subplan requirements	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; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and	Traffic and Transport Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 23 January 2024. Heritage Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2, Revision 5, dated 7 February 2024.			Section 6 of the HMP and Section 7 of the TTMP describe compliance management, that includes complaints management.	Complies	
		j) 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 described in Section 6.2 of the HMP and Section 7.2 of the TTMP.	Complies	
		k) a protocol for periodic review of the CEMP and associated Sub-plans and programs.				Section 1.9 of both plans, and Section 1.10 of the CEMP cover periodic review of the CEMP and plans.	Complies	
S2 C1	Construction Hours	Road upgrades, construction, upgrading and 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 holidays; unless the Planning Secretary agrees otherwise.	Out of Hours Works (PowerPoint training presentation) Toolbox - Out of Hours Works (PowerPoint training presentation) Complaints Register Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 1, Revision 1, dated 21 November 2022. Noise and Vibration Management Plan EnergyConnect (NSW - Western Section) Stage 2, Revision 1, dated 17 March 2023.	Environment Manager – No noise related non-compliances occurred during this audit period.		The approved hours of construction are documented in the Noise and Vibration Management Plan. OOHW training is provided to supervisors and workers on the project. No complaints relating to OOHW were received during the audit period. No evidence of non-compliance against Condition S2 C1 and S2 C2 were identified during this IEA.	Complies	
S3 B2	Construction Hours	The following construction, upgrading and decommissioning activities may be carried out outside the hours specified in condition C1 above: a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons;				No deliveries or dispatches from the project were required NSW Police or other public authorities during this audit period.	Not Triggered	
		b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; or		Environment Manager – Notification for outage works occurred, however this did not proceed during the audit period.		No emergency OOHW were required during this audit period.	Not Triggered	
		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.		Environment Manager - There are no negotiated agreements for this audit period.		There are no negotiated agreements in place for PEC East.	Not Triggered	
		d) activities that are inaudible at non-associated residences;					Noted	
		e) road upgrades required by the relevant roads authority to be undertaken outside the standard construction hours; or		Environment Manager – No works were required by RMS or Council(s) during this audit period.		No works were required by RMS or Council(s) during this audit period.	Not Triggered	

SSI 9172452								
Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S3 B2	Construction Hours	f) works carried out in accordance with an Out-of-Hours Work Protocol approved in accordance with condition C10.		Environment Manager – OOHW during the reporting period included: • foundation works • access points • operation of the batch plant.		OOHW training is provided to supervisors and workers on the project. No complaints relating to OOHW were received during the audit period. No evidence of non-compliance against Condition S2 C1 and S2 C2 were identified during this IEA.	Complies	
S2 C3	Construction and Demolition Noise	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.			During the inspection of works compounds and construction on the easement, no rock breaking, blasting or impulsive noise generating activities were observed.	No noise complaints were recorded during the audit period. No intensive noise generating activities were observed during the site inspection.	Complies	
S2 C4	Construction and Demolition Noise	The Proponent must implement mitigation measures: a) 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 Interim Construction Noise Guideline (DECC, 2009); and b) with the aim of achieving the road traffic noise	Complaints Register	Environment Manager - No noise monitoring occurred during the audit period.		Current construction activities are in sparsely populated areas with a considerable buffer distance between construction activities and residential receivers. No high noise generating activities were observed during the audit inspection, although it is noted that wood chipping and stump grinding would be undertaken during vegetation clearing. No complaints have been received during the audit period for noisy activities (including OOH work).	Complies	
S2 C5	Construction and Demolition Noise	The Proponent must comply with the following vibration limits: a) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); b) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and c) vibration limits set out in the German Standard DIN 4150-3: Structural Vibration - effects of vibration on structures (for structural damage).	Complaints Register	Environment Manager - There were no vibration complaints received during the audit period. No vibration monitoring has occurred during the audit period, no requirements for monitoring have been triggered.		Current construction activities are in sparsely populated areas with a considerable buffer distance between construction activities and residential receivers. No vibration generating activities were observed during the audit inspection. No vibration relating complaints have been received during the audit period.	Complies	
S2 C6	Construction and Demolition Noise	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.		Environment Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
S2 C7	Blasting Limit Conditions	The Proponent must ensure that any blasting carried out on the site does not exceed the criteria in Table 2.	All blast monitoring records covering this audit period.	Environment Manager - No blasting occurred during the audit period.		No blasting occurred during the audit period.	Not Triggered	
	Table 5	**Location**	**Airblast overpressure dB (Lin Peak)**	**Ground Vibration**	**Allowance**			
		Any non-associated residence	120	10	0%			
			115	5	5% of the total number of blasts or events over a rolling period of 12 months			

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C8	Operational Noise	Except for corona discharge noise, the Proponent must ensure that the noise generated by the operation of the development does not exceed 35 dB(A) LAeq,15min, at the reasonably most affected point of the residence, in accordance with the NPfI, at any non-associated residence.	Not Triggered			Operational requirement only	Not Triggered	
S2 C9	Operational Noise	The Proponent must: a) take all reasonable and feasible steps to minimise corona discharge noise during operation of the project; b) identify residences predicted to experience corona discharge noise levels above 35 dB(A) LAeq,15min at the reasonably most affected point of the residence, determined in accordance with the NPfI, and how often corona noise is expected to be above this this level per year; c) implement all reasonable and feasible noise mitigation measures, determined in accordance with the NPfI, at receivers predicted to experience corona discharge noise levels that exceed the noise level identified in condition C8; and d) prepare and implement a Research Program and allocate $150,000 to this program, prepared in consultation with EPA, and be submitted to the Planning Secretary for approval.				Operational requirement only	Not Triggered	
S2 C10	Noise and Vibration CEMP Sub-Plan	The Noise and Vibration CEMP Sub-Plan required under condition B2 must: a) ensure the requirements in conditions C1 to C12 are complied with;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 1, dated 17 March 2023.			The current version of the CEMP and NVMP were prepared and approved during a previous audit period. The NVMP provides a framework designed to ensure compliance with Conditions C1 to C12.	Complies	
		b) include a description of the reasonable and feasible measures that would be implemented to minimise noise and vibration impacts of the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 1, dated 17 March 2023.			Section 7.3 of the NVMP describes the noise and vibration mitigation measures to be implemented.	Complies	
		c) include a detailed description of the noise and vibration management system for the development;	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 1, dated 17 March 2023.			Section 1.4 of the plan describes the environmental management system as it applies to noise and vibration management.	Complies	
		d) include a protocol for the identification, notification and management of works that exceed the noise management levels; and	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 1, dated 17 March 2023.			Section 7,2 and Section 8 of the plan describes compliance management, including the notification requirements and management of works that may exceed noise criteria.	Complies	
		e) include a monitoring program that evaluates and reports on the effectiveness of the noise and vibration management system.	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 1, dated 17 March 2023.			Section 8.3 describes the noise and vibration monitoring program.	Complies	

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Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 C10	Noise and Vibration CEMP Sub-Plan	f) include an Out-of-Hours Work Protocol to identify a process for the consideration, management and approval of works that are outside the hours defined in conditions C1 and C6, which must: (i) be prepared in consultation with the relevant Council; (ii) identify low risk activities that can be undertaken without the approval of the Planning Secretary and with the approval of the ER; (iii) identify high risk activities that must be approved by the Planning Secretary; and (iv) identify Department, Council and community notification arrangements for approved out of hours work.	Noise and Vibration Management Plan EnergyConnect (NSW - Eastern Section) Stage 2, Revision 1, dated 17 March 2023.			Appendix A of the Noise and Vibration Management Plan describes the Out of Hours Works Protocol.	Complies	
S2 C11	Air Quality	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	Incident Register Complaints Register		During the site inspection water carts were observed operating at construction Camps and the substation construction site. Some dust was observed from vehicle movements on-site, however no evidence of migration of dust off-site was observed.	Water carts are available and were observed to be in operation to reduce dust emissions during the site inspection.	Complies	
		b) minimise the surface disturbance of the site.			The clearing limits associated with the construction of the accommodation camps, laydown areas and the transmission line alignment are generally appropriately delineated. In all areas inspected (note that the inspection sampled construction areas and did not include the entire transmission line easement) no evidence of clearing outside of designated clearing limits was sighted.	All vegetation clearing observed appeared to be limited to the approved construction limits.	Complies	
S2 C12	Water Supply	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.		Environment Manager – sufficient water has been available for the project during the audit period. No water licenses are required for this project.			Noted	

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Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 C13	Water Supply	The Proponent must report on water take at the site during construction (whether direct or indirect and whether licensable or exempt) in the Independent Audit, including water taken under each water licence for the development. 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.	Bulpunga Docket Registers for each month of the audit period. Water Consumption Registers for each month of the audit period. C6 & C7 Bulpunga Docket Register 2024 C6 & C7 Garraway Docket Register 2024 Logistics Daily Water Delivery Record 2023 Updated Logistics Daily Water Delivery Record 2024 Updated	Environment Manager – sufficient water has been available for the project during the audit period. No water licenses are required for this project.	No water licences are required for this project. SecureEnergy maintains records of water sourced from off-site (licensed) bores and other commercial sources. The following table provides a monthly summary of water	Complies	

Water Source	Water takes (litres)					
	October 2023	**November 2023**	**December 2023**	**January 2024**	**February 2024**	**March 2024**
Alcheringa	**630,900**	**1,959,300**	**1,559,400**	**512,370**	**2,014,200**	**2,015,100**
Balranald	**x**	**226,000**	**1,040,000**	**941,000**	**602,000**	**1,188,000**
Euston	**x**	**588,000**	**210,000**	**252,000**	**21,000**	**x**
Modica	**87,450**	**98,050**	**74,223**	**101,035**	**78,129**	**100,576**
T800 C6	**x**	**x**	**x**	**x**	**x**	**1,110,000**

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Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 C14	Erosion and Sediment Control	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);	Erosion and Sediment Control Strategy EnergyConnect (NSW – Eastern Section), Revision C, dated 15 August 2022. Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023. ESCP Tower Footprint (with sensitive receivers), Document Number 45860-HSE-PLD-0133, dated 5 September 2022. Type 2 OHTL Access Point General ESCP, Document Number 45860-HSE-PL-G-1030, dated 14 June 2022. Type 4 OHTL Access Point General ESCP, Document Number 45860-HSE-PL-G-1032, dated 9 June 2022. Monthly Erosion and Sediment Control Inspection Report, Camp & Laydown 2, prepared by Ron Billyard CPESC NO 9496, dated 2 August 2023. Monthly Erosion and Sediment Control Inspection Report, SecureEnergy Eastern Access Points, prepared by Ron Billyard CPESC NO 9496, dated 1 August 2023. Monthly Erosion and Sediment Control Inspection Report, SecureEnergy Camp/Laydown 2, Wagga Substation: Eastern Alignment/Access Points, prepared by Ron Billyard CPESC NO 9496, dated 23-24 October 2023. Weekly environmental checklists (examples from the audit period).	Environment Manager - The details of CPESCs involved in project works during the audit period are as follows: Regional Project Consulting Adam Pullen B.Env.Mgt.M.Env.Eng(Hons). CPESC Weekly environmental inspections are undertaken by Environmental Advisors. The contract CPES undertook (and reported on ERSED inspections reports during the audit period.	During the site inspection the following observations were made: • Surface water management (surface drains, sedimentation / retention ponds) are provided at each of the accommodation camps / laydown areas and key construction areas. • Topsoil that has been stripped is stockpiled for future use. • Significant sediment tracking on Kidman Way from the site (Photograph 1). Construction Superintendent stated that they swept the road twice weekly. This is clearly nConcretot enough. There is a grid at the site entrance, but that grid is a cattle grid not a shaker grid. There is no wheel wash / truck wash or other mechanism in place to remove dirt from the trucks (several per hour) that are currently delivering fill for the construction of the substation pad. It is noted that a small wheel wash has been delivered to the site but is too small (T Hutchinson) to accommodate the current fleet of trucks accessing the site. That wheel wash had not been installed – though not practical at that time as a significant number of trucks delivering fill were using that access point. • While each camp has a cattle grid at the site entrance, no rumble grids, suitable for assisting in removing sediments and dust from heavy vehicles are in place.	Appropriate erosion and sediment (surface water management) controls were in place at all sites inspected during this IEA. Routine environmental inspections are undertaken (weekly) and these are recorded on standard checklists. An external ERSED specialist undertakes additional inspections and provides advice to the project. The management of erosion and sediment control is being undertaken in accordance with the approved management plan. Sediment tracking onto public road from the Camps: • Significant sediment tracking on Kidman Way from the camp) was observed and while the Auditor understands that those roads are swept (mechanical sweeper) at least weekly, that sediment accumulation and therefore dispersion as dust or sediment during rain events can occur. • It is noted that the weekly environmental checklist includes confirmation of the operation and maintenance of vehicle wash facilities and other devices including shaker / rumble grids. A recommendation for improvement has been provided.	Complies	In order to minimise the tracking and sediment and mud onto sealed public roads from major site access points and camps, it is recommended that: 1. The procedure for vehicle washdown, including heavy vehicles be reviewed with the aim of reducing the tracking of sediment for vehicles that have not been cleaned onto public roads. 2. Develop a standard approach to the assessment of sediment accumulation at site access points and provide a trigger for road sweeping based on sediment load. 3. Consideration be given to the installation of shaker / rumble grids at all significant site access points, including construction camps where construction traffic accesses public roads.
S2 C15	Pollution of Waters	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.		Environment Manager – No water related incidents or non-compliances have occurred during this audit period.		No water related incidents or non-compliances were recorded during this audit period.	Complies	
S2 C16	Pollution of Waters	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.			Fuel and chemical storage areas were inspected at all camps. All fuels are stored in double skinned, bunded tanks that comply with AS1940. All chemical storage and potentially hazardous waste storage observed were appropriately contained. Spill kits were available at those locations. Concrete batching plants (Photograph 2) have been established. Appropriate surface water controls were observed.	No water-related incidents or non-compliances were recorded during this audit period. All fuels and chemicals observed were stored appropriately. Concrete batching plant surface water controls are appropriate and properly maintained.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C17	Pollution of Waters	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.	Dewatering Procedure EnergyConnect (NSW – Eastern Section), Revision C, dated 11 November 2022.		No groundwater dewatering observed during the site inspection.	Procedures for groundwater dewatering have been established.	Complies	
S2 C18	Riparian Areas	The Proponent must ensure: a) all activities on waterfront land are constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (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.	Incident Register	Environment Manager - No riparian zone incidents have occurred during the audit period.	The Auditor inspected works near (dry) water courses, however no construction activities were observed in riparian zones.	No riparian zone incidents have occurred during the audit period.	Complies	
S2 C19	Flooding	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.		Environment Manager - The Flood Response Plan has been uploaded as an appendix to the TTMP. No consultation with council regarding flooding design has occurred for works during the audit period.		A detailed assessment of flooding and water management issues was undertaken during the previous audits. No changes in design have occurred during this audit period. No flooding impacts have occurred during this audit period.	Complies	
S2 C20	Acid Sulphate Soils	The Proponent must ensure that any construction activities in identified areas of acid sulphate soil risk are undertaken in accordance with the *Acid Sulphate Soil Manual* (Acid Sulphate Soil Management Advisory Committee, 1998).	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No ASS has been encountered during the audit period. If encountered PASS would be managed in accordance with the SWMP. Current activities are outside the areas of known acid sulphate soil risk areas.		Current activities are outside the areas of known acid sulphate soil risk areas.	Not Triggered	
S2 C21	Salinity	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).	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No works have occurred within high salinity areas during the audit period. Consequently, no salinity management activities have been undertaken.		No works have occurred within high salinity areas during the audit period.	Not Triggered	
S2 C22	Soil and Water CEMP Sub-Plan	The Soil and Water CEMP Sub-Plan required under condition B2 must include provisions for: a) ensuring the requirements in conditions C12 – C21 are complied with;	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.	Environment Manager - No reviews or revisions of Soil and Water Management Plan have taken place during the audit period.		The Soil and Water Management Plan provides an appropriate framework to manage compliance with the relevant conditions of the Approval. The plan was not revised during tis audit period.	Complies	
		b) managing flood risk during construction;	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.			Section 5.7 of the SWMP describes the proposed flood response procedures for the project.	Complies	
		c) investigating, assessing and managing contaminated land, soils and groundwater in the development area;	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.			Section 5.6 of the Plan describes the procedures for management of contaminated materials. Section 6.3 of the plan describes the monitoring program for soils and water.	Complies	

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Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 C22	Soil and Water CEMP Sub-Plan	d) investigating, assessing and managing the potential for asbestos and other hazardous materials in the development area; and	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.			Investigating, assessing and managing contaminated land is addressed in Section 5.5. Investigating, assessing and managing groundwater is addressed in Section 3.3.5 and Section 5.8.	Complies	
		e) managing any unexpected and / or suspected contaminated land, asbestos and unexploded ordinance excavated, disturbed or otherwise discovered during construction.	Soil and Water Management Plan EnergyConnect (NSW – Eastern Section), Revision 1, dated 14 March 2023.			Appendix B of the plan describes the management of unexpected finds (including hazardous materials).	Complies	
S2 C23	Biodiversity Restrictions on and Habitat	Unless otherwise agreed with the Planning Secretary, the Proponent must: a) ensure that clearing does not exceed the limits identified in Appendix 2; and	Biodiversity Management Plan EnergyConnect (NSW – Eastern Section), Revision 4, dated 5 July 2023. O5 Land Clearing and Disturbance Register (Eastern), dated 30 May 2024.	Environment Manager – the areas of habitat cleared is less than that specified in Appendix 2 of the Approval.	The Auditor inspected a sample of cleared areas during this IEA. No evidence of clearing beyond approved areas was sighted.	The Auditor reviewed the clearing register provided. The clearing register indicated that no clearing in excess of that approved had occurred.	Complies	
		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.	**Site Inspection Observations** - Clearing zone (south of Lockhart) Tower 204 / Access 5067 ○ The site access was appropriately established, stabilised, and secured. Some survey / demarcation pegs near the access gate had been knocked over. At the downslope side of the access gate a jute role had been staked in place to control sediment run-off. ○ Green and red marker pegs were used. Asked Environmental Adviser and Active Trees supervisor (Active Trees were undertaking vegetation clearing at the time of the inspection) to explain what the survey pegs around the site entry indicated (Photograph 3). A clear explanation was not able to be provided. ○ Our vehicle was blown down to remove potential wees / seeds prior to site access. ○ There were three SMEC ecologists on-site at the time of the inspection. ○ Near the entry (inside the site) the green bunting was lying on the ground and a stockpile of vegetation, and logs had been placed behind the bunting, in the apparent "no go area". Refer to Photograph 4. ○ The Active Trees supervisor explained that they had placed the materials there because they didn't have an alternative location in the tight access track corridor. I believe that those materials could have been stored on the opposite side of the track, an area that was not delineated as an environmental no-go area. The Supervisor was unable to confirm whether he made the decision to place those materials there or if the Ecologists (SMEC) who were on-site had given the ok to place those materials there. ○ I spoke to Ecologist from the SMEC Ecology Team – they were not aware of the stockpile (it was clearly visible to anyone on-site). She could not explain the significance of the non-go area or whether SMEC had approved the location of the stockpile. Irrespective, approval should never be given to ignore no-go flagging. ○ I was provided with the clearing permit by the Active Trees supervisor. From those plans it appeared that the area might be part of the Squirrel Glider habitat. ○ GREEN FLAGGING is being used at this site to delineate the extent of clearing. Orange poles (the ones that have a flat base and are not secured into the ground. Some red flagging was located within the area approved to be cleared but it was not clear as to what that bunting was indicating. I note that survey pegs identifying the site boundary or clearing limits were not used in this area. ○ This was different to the use of flagging / pegging in PEC West. ○ Installation of flagging – the SMEC Ecologist stated that the arborists placed crosses on the trees to be removed, and then SMEC placed the green flagging to delineate the extent of clearing. The Ecologist stated that they also cross referenced their maps (hard copy) to identify the extent of clearing.			Detailed clearing procedures have been documented and implemented as per the Biodiversity Management Plan. Pre-clearing surveys are undertaken to identify all trees to be removed, habitat trees and areas to be protected (for biodiversity and cultural heritage purposes). Clearing is being undertaken by a clearing contractor and is guided by GPS and GIS systems with live data available to the clearing crew. A clearing register is maintained by the Environment Manager. Clearing and Ground disturbance permits are held by the clearing contractor). The permit is signed by the project ecologist and includes key ecological items including: • Exclusion Zones • Preclearing ecologist inspection • Requirement for a fauna spotter • Requirement for nest boxes • Retention of habitat features Subsequent review of the clearing limits at Tower 204 indicated that the stockpile located behind the exclusion fencing was not in the area of sensitive habitat requiring protection. However, the Auditor is concerned that the actions of the clearing contractor and lack of proactive intervention by the ecologists responsible for establishing the no-go areas could result in inadvertent impacts on habitat.	Complies	Opportunity for Improvement – Review and update the induction / training of SecureEnergy and Contractor clearing supervisors and the specialist ecologists to ensure that they understand: 1. the meaning and significance of site all boundary markings (e.g. survey pegs). 2. The use of clearing limit and no go area flagging. 3. No clearing, parking of vehicles or stockpiles are permitted in any area that is identified as a no-go area by fencing, flagging or signage.

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C24	Biodiversity Off-set Package	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: (a) details of the specific biodiversity offset measures to be implemented and delivered in accordance with the EIS; (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.	Project EnergyConnect (NSW Western Section) Biodiversity Offset Package Rev 0, 01/11/22. Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Compliance with this Condition was verified in the last IEA. The Biodiversity Offset Strategy was approved by DPE on the 13/2/23	Complies	
S2 C25	Biodiversity Off-set Package	Prior to carrying out any development that could impact the biodiversity values requiring offset, the Proponent must lodge bank guarantee(s) with a total value of $313,417,479.03, in accordance with the Deed of Agreement with the Planning Secretary (or delegate) executed on 1 September 2022. The Proponent must comply with the terms of the Deed.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Compliance with this Condition was verified in the last IEA. Bank guarantees to the value of $313,500,000 were provided to the Planning Secretary on 8/11/22.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C26	Biodiversity CEMP Subplan	The Biodiversity EMP Sub-Plan required under condition B2 must be prepared in accordance with the Revised Biodiversity Development Assessment Report (dated 19 August 2022) and include: a) a description of the measures that would be implemented for: (i) meeting the biodiversity mitigation requirements in condition C23; (ii) minimising the amount of native vegetation clearing within the development area; (iii) minimising the loss of key fauna habitat, including tree hollows; (iv) minimising the impacts on fauna on site, including undertaking pre-clearance surveys; (v) minimising the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species; (vi) rehabilitating and restoring disturbance areas to its pre-existing condition; (vii) avoiding and minimising impacts on Serious and Irreversible Impact (SAII); (viii) construction clearing and operation vegetation management protocols; (ix) monitoring of the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to the construction vegetation clearing protocols; (x) protecting native vegetation and key fauna habitat outside the approved disturbance area; (xi) 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 restoration of the site; (xii) a Connectivity Strategy and a Supplementary Hollow and Nest Strategy; (xiii) controlling weeds; (xiv) controlling erosion; and (xv) bushfire management; and	Biodiversity Management Plan EnergyConnect (NSW – West) Stage 2, Revision 4, dated 5 July 2023.			Biodiversity management measures are described in Section 5 and compliance management is presented in Section 6 of the Biodiversity Management Plan.	Complies	
		b) a detailed program to monitor and report on the effectiveness of these measures.	Biodiversity Management Plan EnergyConnect (NSW – West), Revision F, dated 10 June 2022.			The monitoring program is presented in Section 6.3 of the Biodiversity Management Plan.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C27	Heritage Un-Surveyed Areas	Prior to carrying out any construction within the unsurveyed areas of the development area identified in the EIS, or any potential archaeological deposits (PADs) identified for impact during detailed design, the Proponent must provide an Addendum Aboriginal Cultural Heritage Assessment Report (Addendum ACHAR), prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary. The report must: a) include details of consultation with the Aboriginal stakeholders;	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, Revision 10, dated 24 January 2024.	Environment Manager - The ACHAR has been uploaded. The Aboriginal Cultural Heritage Training presentation has been uploaded. There is also an online Cultural Awareness course and Michael Lyons has been engaged to deliver face-to-face training. Unexpected finds have been included.		Compliance with Condition S2 C27 was verified in the last IEA. A clearance letter provided by Navin Officer for additional areas that were not surveyed by the original ACHAR including: • Works within the previously disturbed corridor of Country Boundary Road and Lockhart Road, Lockhart to accommodate road upgrades and install traffic signage • Inclusion of minor additional areas surrounding the proposed Lockhart construction compound • including an area to the north of Lockhart Road; and • Other pre-construction minor works within the previously disturbed road corridor. The clearance letter noted that No Aboriginal Sites, PADS or areas of cultural sensitivity were identified in the survey area. Navin Officer have prepared an Addendum to the ACHAR.	Complies	
		b) describe the additional Aboriginal heritage surveys that were undertaken, including test excavations of PADs;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 5 of the Addendum to the ACHAR describes the additional heritage assessment carried out in previously unsurveyed areas.	Complies	
		c) describe any potential additional impacts to heritage items;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 6 and 7 assesses the potential impacts to the new sites identified during the additional surveys.	Complies	
		d) identify further mitigation measures, including avoidance or salvage;	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Table 8.1 provides recommended impact mitigation strategies for each identified heritage site.	Complies	
		e) include detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Section 7.1 provides justifications for unavoidable impacts to heritage items.	Complies	
		f) provide 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.	EnergyConnect (NSW – Eastern Section) Addendum Aboriginal Cultural Heritage Assessment Report, prepared by Navin Officer, dated 24 January 2024.			Table 8.1 provides a consolidated list of sites that will be protected, salvaged or relocated.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C28	Protection of Heritage Items	The Proponent must: a) ensure the development does not cause any direct or indirect harm to Aboriginal heritage items located outside the development area;	Incident Reports	Environment Manager – There have been no impacts to aboriginal cultural heritage items, located outside of the approved project during this audit period.	An investigation site was inspected (refer to Photograph 5).	No work has been undertaken outside the approved project boundary/development area to date. No harm to aboriginal items located outside of the approved project boundaries has been reported during this audit period.	Complies	
		b) implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items and PADs within the development area; and	Detailed Investigation Report Incident Number INC-6882. Letter from Transgrid (L Fania) to DPE (D Fishburn) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Follow up incident notification", dated 14 March 2024.			Two incidents relating to protection of Aboriginal Heritage were recorded during this audit period. On 24 January 2024, grading works occurred on the access track between Towers 131 and 132 on the Line 5 alignment where an isolated artefact, PEC-E-75 had been previously recorded. The work was undertaken in an area that was not the subject of a *Land Disturbance Permit*. A detailed investigation was undertaken by Elecnor. On 4 or 5 March 2024 work (leveling the top 50 – 80mm of soil) on an access track in PAD 29 occurred. This incident is under investigation at the time of preparation of this audit report.	Non-Compliance	A detailed investigation was undertaken in relation to the January 2024 incident, and mitigation measures implemented. No additional actions have been recommended. Following completion of the investigation into the March incident, review all management plans and procedures related to heritage management and protection and implement all recommendations from the investigations.
		c) salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.		Environment Manager – No salvage reports have been prepared during this audit period.		EnergyConnect reported that no salvage works had been undertaken during this audit period.	Not Triggered	
S2 C29	Protection of Heritage Items	The Proponent must; a) Ensure the development does not cause any direct or indirect harm to any heritage items located outside the development area; and	Incident Reports	Environment Manager – There has been access point and track works outside the development layout. Each area was surveyed prior to works being undertaken. No impact to heritage items has occurred.		No harm to any items located outside of the approved project boundaries has been reported during this audit period.	Complies	
		b) Implement all reasonable and feasible measures to avoid and minimise harm to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards at PEC-E-H3 (Bundure railway station dwelling artefact scatter), prior to carrying out any development that could harm the items or deposits.	Incident Reports	Environment Manager - No impacts to items identified for avoidance.		No work has been undertaken outside the approved project boundary/development area to date. No harm to the identified items located outside of the approved project boundaries has been reported during this audit period.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C30	Heritage EMP Subplan	The Heritage EMP Sub-Plan required under condition B2 must: a) include a description of the measures that would be implemented for: (i) protecting Aboriginal heritage items and PADs in accordance with conditions C28(a) and C28(b); (ii) minimising and managing the impacts of the development on heritage items within the development area, including: − salvaging and relocating the Aboriginal heritage items identified in accordance with condition C28(c); − archival recording and/or salvage of the heritage items and sites identified in condition C29, where impacts cannot be avoided, including consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 (Bundure railway station dwelling artefact scatter); − a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; (iii) a contingency plan and reporting procedure if: − heritage items outside the approved disturbance area are damaged; − previously unidentified heritage items are found; or − skeletal material is discovered; (iv) 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 (v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. Agency Consultation Report EnergyConnect (NSW – Eastern Section) Heritage Management Plan (Stage 2), Revision D, dated 17 January 2024.			The Aboriginal Cultural Heritage Management Strategy was prepared prior to the commencement of construction. The current version of the strategy was revised during this audit period (and now covers both Stages 1 and 2 of construction. The required consultation was undertaken during the preparation of this revision of the plan. The Strategy meets the contents requirements of this Condition, specifically: • protecting Aboriginal heritage items and PADs – Section 5.7 • salvaging and relocating the Aboriginal heritage items – Section 5.6 • archival recording – Section 5.6 • consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 – Section 5.6.6 and 5.6.7 • long-term management of any heritage items or material collected – Section 5.8 • a contingency plan and reporting – Section 6.6 and 6.8 • heritage inductions – Section 6.1 • ongoing consultation with Aboriginal stakeholders – Section 1.7	Complies	
		b) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the development.				Inspections, audits, and reporting is described in Section 6 of the Aboriginal Cultural Heritage Management Strategy.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C31	Traffic and Transport	All over-dimensional vehicles associated with the development must only travel to and from the site via the Primary Access Routes described in the EIS, as identified in the figure in Appendix 3, unless the Planning Secretary agrees otherwise.	Driver's Code of Conduct EnergyConnect, Revision D, dated 9 October 2023. Complaints Register	Environment Manager - The Drivers Code of Conduct is an appendix of the Traffic and Transport Management Plan. No additional routes were approved in the reporting period.		The Drivers Code of Conduct contains details of all approved heavy vehicle routes. No complaints were received during the audit period relating to heavy vehicle routing.	Complies	
S2 C32	Traffic and Transport	All heavy and light vehicles associated with construction, upgrading and decommissioning of the development must travel to and from the site via the Primary Access Routes, Secondary Access Routes and Water Supply Routes as described in the EIS and identified in the figure in Appendix 3, unless the Planning Secretary agrees otherwise.	Driver's Code of Conduct EnergyConnect, Revision D, dated 9 October 2023. Complaints Register			The Drivers Code of Conduct contains details of all approved heavy vehicle routes. No complaints were received during the audit period relating to vehicle routing.	Complies	
S2 C33	Road Upgrades	Unless the Planning Secretary agrees otherwise, the Proponent must implement the road upgrades identified in Appendix 3 in accordance with the relevant standard and timing requirements, to the satisfaction of the relevant roads authority.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.	Environment Manager - access points have been installed during the reporting period.		Compliance with this Condition was verified in the last IEA.	Complies	
S2 C34	Road Maintenance	The Proponent must: a) undertake independent dilapidation surveys to assess the: (i) existing condition of all local roads on the transport routes (including local road crossings) prior to use for construction, upgrading or decommissioning works; and (ii) condition of all local roads on the transport routes (including local road crossings): − within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority; − 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; and c) prepare a report in consultation with the relevant roads authority. If there is a dispute about the road maintenance works, or the implementation of these works, then either party may refer the matter to the Planning Secretary for resolution.		Environment Manager - There have been no dilapidation surveys undertaken during the reporting period. No road repairs have been required in the reporting period.		No dilapidation surveys undertaken during the reporting period. No road repairs have been required in the reporting period.	Not Triggered	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S3 C35	Traffic and Transport CEMP Sub-Plan	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;	Traffic and Transport Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			Section 5 of the Traffic and Transport Management Plan describes the approved traffic routes.	Complies	
		b) details of the road upgrade works required by condition D33 of this approval, including; (i) Final number, location and type of Minor Access Points intersections to be implemented; and (ii) Verification that the proposed types of intersection treatments have sufficient capacity for the proposed vehicle numbers;	Traffic and Transport Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			Section 6.2 describes the Condition D33 upgrade works.	Complies	
		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; employee use of this service;	Traffic and Transport Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S3 C35	Traffic and Transport CEMP Sub-Plan	The Traffic and Transport CEMP Sub-Plan required under condition B2 must include: c) details of the measures that would be implemented to: - 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 - 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 entering or leaving the site have their loads covered or contained; - responding to any emergency repair or maintenance requirements; - provisions for maintaining emergency vehicle access at all times; - a traffic management system for managing over-dimensional vehicles; and - fatigue management. • comply with the traffic conditions in this approval;	Traffic and Transport Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			Section 6 of the plan describes the traffic and transport management measures to be implemented.	Complies	
		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	Traffic and Transport Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			The Drivers Code of Conduct is provided in Appendix A.	Complies	
		e) a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding.	Traffic and Transport Management Plan EnergyConnect (NSW – Eastern Section) Stage 1 and 2, Revision 10, dated 19 April 2024.			The Flood Response Plan is provided in Appendix B.	Complies	

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Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 C36	Visual Impact Mitigation	Unless the Planning Secretary agrees otherwise, for a period of 2 years from the commencement of operations, the owners of R186, R233, R385, R422, R432, R450, R461, R501, R502 and R26749 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.				Operations Phase Condition.	Not Triggered	
S2 C37	Visual Impact Mitigation	Prior to submitting the Final Layout Plans for towers 16 and 17 as identified in the EIS, the Proponent must provide reasonable and feasible measures to minimise the visual impacts on residence R26749, including increasing setbacks, in consultation with the owner of the residence, to the satisfaction of the Planning Secretary. Following approval, the Proponent must implement these measures.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Visual impact measures have been provided to DPE. DPE noted they are satisfied with the measures proposed and approved the visual mitigation measures outlined in the Transgrid letter dated 15 August 2023.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C38	Visual Appearance	The Proponent must: a) Take reasonable steps to minimise the off site visual impacts of the development; and	Complaints Register.		Camps were inspected. No lighting issues (for example intrusive light on residential properties or road users) were identified.	Site compound locations are not visible from the residential areas and are unlikely to cause any visual impacts. The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users. No lighting complaints were received during the audit period.	Complies	
		b) Not mount any advertising signs or logos on site, except where it is required for identification or safety purposes.			Signage at site access points across the construction corridor were observed. No signage considered to breach this condition was observed.	No advertising signs or logos were observed at either site, other than for the purposes of site identification and safety.	Complies	
S2 C39	Lighting	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: • 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.	Complaints Register.		Camps were inspected. No lighting issues (for example intrusive light on residential properties or road users) were identified.	Site compounds constructed for the project locations are not visible from the residential areas and are unlikely to cause any visual impacts. The lighting provided is appropriate for the development and is unlikely to cause glare issues for road users. No lighting complaints were received during the audit period.	Complies	
C40	Radio Communications	If the development results in the disruption to any radio communications services (including point-to-point microwave links) in the area, then the Applicant must make good any disruption to these services as soon as possible following the disruption, but no later than 1 month following the disruption of the service unless the relevant service provider or user or Planning Secretary agrees otherwise.		Environmental Manager – No radio communications issues have occurred during this audit period.			Not Triggered	
S2 C41	Dangerous Goods	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.	Incident Register		During the site inspection, the Auditor inspected fuel and other hazardous materials storage facilities. All flammable and combustible materials sighted were stored in appropriately bunder containers / areas compliant with AS1940. See for example Photographs 6 and 7. Spill cleanup kits were located adjacent to storage areas. The storage and management of hazardous materials is of a high standard.	The storage and management of hazardous materials is of a high standard and meets the requirements of the relevant Australian Standards.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C42	Electrical and Magnetic Fields	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).	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Three design studies have been undertaken for the transmission lines and incorporate the requirements of the (ICNIRP) Guidelines. Each study concludes that the power frequency electric and magnetic field levels near ground level are confirmed to be acceptable to humans, livestock and plants.	Complies	
S2 C43	Induced Current Risk	Prior to any works traversing the high-pressure gas main (Bowmen – Culcairn Pipeline) easement, including above ground electricity transmission lines, the proponent must undertake an induced electrical current risk assessment identifying potential risks to the pipeline, including any physical mitigation measures and ongoing management requirements.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Works have not been undertaken in proximity to the high-pressure gas main to date. Consultation with APA, the owner of the gas pipeline is underway with an earthing report prepared by Aurecon.	Complies	
S2 C44	Bushfire Safety	The Proponent must: a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022. Training PowerPoint Presentation titled “Fire Safety During Construction”.	Environment Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period. Fire safety training is provided to the workforce.	Complies	
		b) ensure that the development: • complies with the relevant asset protection requirements in the RFS’s Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; • 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;	Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) - Rev 0 dated 2/3/22 Accommodation Camp Management Lockhart - Rev 2 dated 10/3/23 Accommodation Camp Management Plan Dinawan – Rev 2 dated 10/3/23	Environment Manager – no fire related incidents have occurred during the audit period.		The Accommodation Camp Management Plan describes the fire control strategies and resources available.	Complies	
		c) 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;				Plans for the camp building include specifications for compliance with the relevant fire standards and BAL specifications.	Complies	
		d) develop procedures to manage potential fires on site, in consultation with the RFS and FRNSW;	Agency Consultation Report EnergyConnect (NSW – Eastern Section) Emergency Plan, Rev A, dated 7 November 2022. PowerPoint presentation titled “Project Overview FRNSW”.	Environment Manager – A meeting was held with FRNSW at which we presented our fire management strategy.		SecureEnergy sought RFS input during the preparation of the Emergency Plan. A presentation was provided to FRNSW on the fire management strategy.	Complies	
		e) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and		Environment Manager - No bushfire incidents have occurred during the audit period.		No bushfire incidents have occurred during the audit period.	Not Triggered	

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Cond.	**Title**	**Condition**	**Documents Reviewed**	**Interviews**	**Site Inspection**	**Compliance Assessment**	**Finding**	**Recommendation**
S2 C44	Bushfire Safety	f) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.					Not Triggered	
S2 C45	Emergency Plan	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 RFS, 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, Dinawan Substation and Wagga Wagga Substation at all times.	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022. Agency Consultation Report EnergyConnect (NSW – Eastern Section) Emergency Plan, Rev A, dated 7 November 2022.		Hard Copies of the plan were located at each camp.	The Emergency Plan has been prepared but was not available on the project website at the time of the site inspection. Hard Copies of the plan were located at each camp. SecureEnergy provided the RFS with a copy of the plan and requested input from the RFS. It is noted that the Emergency Plan (Section 1.6 Availability of the plan) states that the Emergency Plan will be available on the website. The plan was not available at the time of this IEA.	Non-Compliance	Upload the Emergency Response plan to the Transgrid Website.
		The plan must; a) be consistent with: • RFS's Planning for Bushfire Protection 2019 (or equivalent); • 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;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			The plan is generally consistent with the requirements of the relevant guidelines.	Complies	
		b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Section 4 of the plan identifies fire hazards and risks.	Complies	
		c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Section 8 (Emergency Response) describes the procedures to be implemented to address a fire on or near the site(s).	Complies	
		d) list works that should not be carried out during a total fire ban;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Section 6.3.1 describes the activities that must not be carried out during a total fire ban.	Complies	
		e) include availability of fire suppression equipment, access and water;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Section 7.4 describes the location and availability of fire fighting water supplies.	Complies	
		f) include procedures for the storage and maintenance of any flammable materials	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Section 6.4 describes the management of flammable materials.	Complies	
		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;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Section 7.5 describes site access for emergency vehicles and Section 9.1 provides emergency contact information.	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C45	Emergency Plan	h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s);	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Appendix B, titled "Asset protection zone", of the Emergency Plan provides aerial photographs of each Camp. The location of the fire water tanks (or any other infrastructure) is not shown. The lack of detail could (infrastructure) could impact the rapid identification of the location of firefighting equipment and water storage.	Non-Compliance	Update the plans in Appendix B of the Emergency Plan to include plans of each camp site showing the site infrastructure and the location of firefighting water supply tanks.
		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;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Appendix A provides details of the location of fire hazards.	Complies	
		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;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Appendix B and Section 6.1 address the asset protection zones.	Complies	
		k) include bushfire emergency management planning;	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Section 7 describes bushfire preparedness.	Complies	
		l) 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	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Section 9 describes emergency communications procedures.	Complies	
		m) include details on how live transmission infrastructure can be safely isolated in an emergency.	Emergency Plan EnergyConnect (NSW – Eastern Section), Revision 0, dated 9 November 2022.			Table 2.1 in Section 2.2 states "Site personnel should not attempt fire control activities near energized lines. In the event there is a fire near powerlines, early notification will be communicated to TransGrid or the respective electricity company / transmission line asset owner to allow an assessment of risks associated with deenergising the powerline".	Complies	

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Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C46	Waste	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; 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.	Waste Management Plan EnergyConnect (NSW – Eastern Section) Revision B, dated 21 September 2022.		Recycling facilities (skip bins) are available on site for both general waste and recyclable waste Typical waste storage is shown on Photograph 7.	A waste management plan has been prepared and implemented for the project. Facilities for collections, segregation and storage of wastes are provided at each camp. Waste tracking register includes general waste, sanitary bin waste, concrete, contaminated soil, hydrocarbon waste and timber.	Complies	
S2 C47	Waste	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.		Environment Manager - No waste importing has been undertaken by the Project during the audit period.	No evidence of the importation of wastes was sighted during the site inspections.	No importation of waste onto the project site was reported for this audit period.	Not Triggered	
S2 C48	Waste	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 Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	Cleanaway waste collection invoices covering the audit period.	Environment Manager – Cleanaway is contracted to provide waste and recycling bins, and to collect wastes for processing (recycling) or disposal.	Appropriate waste storage is provided at all work sites and camps inspected. Refer for example to Photo 7.	Waste records were not made available to the Auditor, therefore compliance with this Condition could not be verified.	Non-Compliance	Prepare a register of key compliance documentation needed to demonstrate compliance with the Project Approval and maintain those records.
S2 C49	Waste	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 records were not made available to the Auditor, therefore compliance with this Condition could not be verified.	Non-Compliance	Prepare a register of key compliance documentation needed to demonstrate compliance with the Project Approval and maintain those records.

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C50	Accommodation Camp	Prior to establishing the accommodation camps, the Proponent must prepare an Accommodation Camp Management Plan in consultation with the relevant Council. The plan must: a) ensure utilities at the accommodation camps, including water, wastewater, waste and electricity, are designed and located in accordance with Council specifications and relevant standards;	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. Accommodation Camp Management Plan Buronga (Camp 6) and Wentworth (Camp 7) - Rev 0 dated 2/3/22. Accommodation Camp Management Lockhart - Rev 2 dated 10/3/23. Accommodation Camp Management Plan Dinawan – Rev 2 dated 10/3/23.	Environment Manager – a minor amendment to the Accommodation Plan was made in October last year to remove reference to Clough and to reflect the approved number of camps.		The Accommodation Camp Management Plans have been prepared and implemented. The plans were not revised during this audit period. Section 2.4 of the plans reference the standards and guidelines used to develop the plan.	Complies	
		b) ensure the accommodation camp complies with conditions C19 and C44;				The Accommodation Camp Management Plans provide an appropriate framework for compliance against the condition of approval.	Complies	
		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;			Treated effluent from site water treatment systems is stored and used for dust suppression.	The reuse of treated wastewater is described in Section 7.4 and 7.5 of the Accommodation Management Plans.	Complies	
		d) include measure for dust suppression within the accommodation camps;				Dust management is described in Section 7.5 of the Plans.	Complies	
		e) provide the site layout including building locations, vehicle access and movement, site servicing and utilities infrastructure; and				Site layout plans are provided in Section 4.1 (Figures 4.1 and 4.2).	Complies	
		f) include measures to support local suppliers in servicing the camp where possible.				Engagement of local suppliers is covered in Section 8.3.	Complies	
		Following approval, the Proponent must implement the Accommodation Camp Management Plan.			The camps were inspected and appeared to be set out and operated in general accordance with the Accommodation Management Plans.	The camps were being operated in general accordance with the Accommodation Management Plans at the time of this audit.	Complies	
S2 C51	Local Business and Employment Strategy	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. The Proponent must implement the Accommodation and Employment Strategy.		Environmental Manager – the Local Business and Employment Strategy was not revised during this audit period.		Compliance with this condition was verified during the last IEA. The Local Business and Employment Strategy has been prepared and implemented. A Local Industry Participation Manager (LIPM) has been appointed to identify opportunities for local goods and services and facilitate their procurement. The Local industry and indigenous participation is monitored and reported internally on a monthly basis. In addition, an Indigenous Participation Manager has been appointed whose role is to promote indigenous participation on the project.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 C52	Rehabilitation	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.					Not Triggered	
S2 D1	Environmental Management Strategy	The Proponent must prepare an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must: a) provide the strategic framework for environmental management of the development;	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental. Construction Environmental Management Plan EnergyConnect (NSW-Eastern Section) Stage 1 and 2, Revision 2, dated 20 June 2023.	Environment Manager - the EMS has been integrated with the CEMP. The CEMP was not revised during this audit period.		The EMS has been integrated with the CEMP. The CEMP was not revised during this audit period. The CEMP / EMS provides an appropriate framework for environmental management of the construction phase of the project.	Complies	
		b) identify the statutory approvals that apply to the development;				Section 3.1 describes the statutory approvals required for this project.	Complies	
		c) set out the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;				Section 4.9 describes the key roles and responsibilities assigned under the EMS.	Complies	
		d) set out the procedures to be implemented to: (i) keep the local community and relevant agencies informed about the construction, operation and environmental performance of the development; (ii) receive record, handle and respond to complaints; (iii) resolve any disputes that may arise during the course of the development; (iv) respond to any non-compliance and any incident; (v) respond to emergencies; and e) include: (i) references to any strategies, plans and programs approved under the conditions of this consent; and (ii) a clear plan depicting all the monitoring to be carried out under the conditions of this consent.				Section 4 describes the Environmental management system and includes the requirements of this condition.	Complies	
		The Proponent must not commence construction until the Environmental Management Strategy is approved by the Planning Secretary.	Letter for Transgrid (J Fisher) to DPE (D Cassel) titled “EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of commencement of construction (condition D3)”, dated 10 July 2023.			Stage 2 construction works commenced on 17 July 2023. The CEMP was finalised on 20 June 2023.	Complies	
		The Proponent must implement the Environmental Management Strategy as approved by the Planning Secretary				The project is being undertaken in general accordance with the requirements of the EMS.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D2	Revision of Strategies, Plans and Programs.	The Proponent must review and, if necessary, revise the strategies, plans or programs required under this approval to the satisfaction of the Planning Secretary within 3 month of the: • submission of an incident report under condition E6;		Environment Manager – two reportable incidents occurred during the audit period.		Two reportable incidents occurred in the latter stages of this audit period. A review of the associated management plan (heritage) should be undertaken prior to the end of the next audit period. This Condition was not triggered during the last IEA.	Not Triggered	
		• submission of an audit report under condition E11; or		No documents were revised as a result of the previous IEA.		Management assessed that the findings of the last audit report did not warrant any specific plan revisions.	Complies	
		• any modification to the conditions of this approval.				No Modifications to the Approval occurred during this audit period.	Not Triggered	
S2 D3	Notification	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. 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.	Letter for Transgrid (J Fisher) to DPE (D Cassel) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of commencement of construction (condition D3)", dated 10 July 2023.			Notification of the commencement of works (both Stages 1 and 2) were issued to the Planning Secretary prior to the commencement of those works.	Complies	
S2 D4	Final Layout Plans	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; a) Details on siting of transmission towers, ancillary infrastructure and/ or ancillary facilities; and b) Showing comparison to the approved layout and approved vegetation clearing. The Proponent must ensure that the development is constructed in accordance with the Final Layout Plans.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Final layout Plans for Stage 1 were submitted to DPE on 12/12/22 with updated plans submitted to DPE on 3/3/22. Final Layout plans for Stage 2 were submitted to DPE on the 12th of July 2023 and are available on the DPE website	Complies	
S2 D5	Work as Executed Plans	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 yet required	Not Triggered	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D6	Incident Notification, Reporting and Response	The Department must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	Detailed Investigation Report Incident Number INC-6882. Letter from Transgrid (L Fania) to DPE (D Fishburn) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Follow up incident notification", dated 14 March 2024.			Two incidents relating to protection of Aboriginal Heritage were recorded during this audit period. On 24 January 2024, grading works occurred on the access track between Towers 131 and 132 on the Line 5 alignment where an isolated artefact, PEC-E-75 had been previously recorded. The work was undertaken in an area that was not the subject of a *Land Disturbance Permit*. The works resulted in the destruction of a heritage artifact. The incident was reported to DPHI. A detailed investigation was undertaken by Elecnor. On 4 or 5 March 2024 work (leveling the top 50 – 80mm of soil) on an access track in PAD 29 occurred. The works resulted in the destruction of a heritage artifact. The incident was reported to DPHI. This incident is under investigation at the time of preparation of this audit report.	Complies	
S2 D7	Non-compliance Notification	The Secretary must be notified in writing via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance.	Letter from Transgrid (L Fania) to DPE (M Fishburn) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of non-compliance with condition A13", dated 22 December 2023. Letter from Transgrid (L Fania) to DPE (M Fishburn) titled "EnergyConnect (NSW – Eastern Section) (SSI-9172452) – Notification of non-compliance", dated 30 January 2024.			The proponent notified DPE of three non-compliances against the approval occurred during the audit period.	Complies	
S2 D8	Non-compliance Notification	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.				The proponent notified DPE of three non-compliances against the approval occurred during the audit period. The non-compliance notifications meet the requirements of this Condition.	Complies	
S2 D9	Non-compliance Notification	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.					Noted	
S2 D10	Notification to Landholders	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 - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			The notifications were issued to relevant landowners in March 2023.	Complies	
S2 D11	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.	Independent Environmental Audit - SSI – 9172452 – Project EnergyConnect (NSW Eastern Section), dated 10 November 2023, prepared by Trigalana Environmental.			Initial audit undertaken on 17 and 18 August 2022, within 3 months of construction commencement. Subsequent three audits were undertaken 6 monthly and in compliance with this condition.	Complies	

SSI 9172452								
Cond.	Title	Condition	Documents Reviewed	Interviews	Site Inspection	Compliance Assessment	Finding	Recommendation
S2 D12	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, programs or reports 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; (vii) any independent environmental audit, and the Proponent's response to the recommendations in any audit; and (viii) any other matter required by the Planning Secretary; and	https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents			All documents required by this Condition were available on the Transgrid website. The complaints register is provided on the Transgrid website. The complaints documented, as presented by Transgrid often: • Lack clear descriptions of the nature of the complaint. • Do not provide details on the outcomes of investigations undertaken. • Do not provide follow-up information (committed to in the actions presented) • Do not indicate if the complaint has been closed and when that occurred.	Complies	Ensure that the complaints register a provides clear, completed and accurate record of all complaints received, including: • Clear descriptions of the nature of the complaint. • Complete details on the outcomes of investigations. • follow-up information (committed to in the actions presented) • Indicate if the complaint has been closed and when that occurred.
S2 D12	Access to Information	a) keep this information up to date.	https://www.transgrid.com.au/projects-innovation/energyconnect/determinations-and-post-approval-documents			The following superseded documents had not been removed from the Transgrid Website: • PECE Stage 1 Construction Environmental Management Plan, Rev 0 • PECE Stage 1 Biodiversity Management Plan Rev 1 • PECE Stage 1 Traffic and Transport Management Plan Rev 5 All of these plans have been superseded with plans that cover both Stages 1 and 2.	Complies	

Appendix B

Audit Photographs

Photograph 1 – Sediment Tracking onto Kidman Way

Photograph 2 – On-site concrete batching plant

Photograph 3 – Typical Site to construction sites

Photograph 4 – Vegetation Stockpile outside of no-go fencing (green flagging)

Photograph 5 – Cultural Heritage Investigation Excavation

Photograph 6 – Hazardous Materials Storage

Photograph 7 – Fuel Storage


Photograph 8 – Typical Waste Storage

Appendix C

Auditor Approval

NSW GOVERNMENT

Department of Planning and Environment

Contact: Georgia Dragicevic
Phone: 4247 1852
Fax: 4224 9470
Email: Georgia.Dragicevic@planning.nsw.gov.au

Mr Luke Fania
Environment and Sustainability Manager
NSW Electricity Networks Operations Pty Limited
180 Thomas Street
HAYMARKET, NSW, 2000
5 December 2023

Dear Mr Fania

Project EnergyConnect (NSW - Eastern Section) (SSI-9172452)
Independent Environmental Auditor 2023

I refer to your letter dated 30 November 2023, seeking the agreement of the Planning Secretary of the Department of Planning and Environment ("the department") of the suitability of the auditor's qualifications, experience and independence to undertake an independent audit of the Project EnergyConnect (NSW - Eastern Section) ("the development"), in accordance with Schedule 2, Condition D11 of State significant infrastructure approval SSI 9172452 ("the approval").

Having considered the qualifications and experience of Mr Ken Holmes of Barnett and May Pty Ltd, the Planning Secretary endorses the appointment of Mr Holmes to undertake the audit in accordance with Condition D11 of the approval. This approval is conditional on Mr Holmes being independent of the development and maintaining Exemplar Global certification. The department reserves the right to request an alternate auditor or audit team for future audits.

Please ensure this correspondence is appended to the Audit Report.

The audit is to be conducted in accordance with the Department's Independent Audit Post Approval Requirements (May 2020). A copy of the requirements can be located at https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements. Auditors may wish to have regard to AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Audit Report, including the response to any recommendations contained in the audit report and a timetable to implement the recommendations is to be submitted to the Planning Secretary, with the Audit Report.

Failure to meet these requirements will require revision and resubmission of the Audit Report.

Yours sincerely

Katrina O'Reilly
Team Leader Compliance *as nominee of the Planning Secretary*

Stakeholder Consultation

Appendix D

Our ref: OUT24/2854

Ken Holmes
Barnett & May
Email: ken@baeckea.com.au

Date: 27 February 2024

Subject: Project Energy Connect - Independent Environmental Audit (SSI 9172452)

Dear Ken Holmes,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
    - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
    - Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact NSW DCCEEW Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,

Tim Baker
Senior Project Officer
Water Assessments
NSW Department of Climate Change, Energy, the Environment and Water

From:	South West Planning Mailbox
To:	Ken Holmes
Cc:	Simon Maffei; Adam Vey
Subject:	BCS Response RE: Project Energy Connect PEC East - Independent Environmental Audit
Date:	Thursday, 14 March 2024 4:15:52 PM
Attachments:	image001.png

Hi Ken,

Thank you for seeking input from BCS into the third Independent Environmental Audit of Project Energy Connect East.

For this audit BCS would appreciate if you could focus on the implementation of the mitigation measures documented in the Revised Biodiversity Development Assessment Report, dated 19 August 2022, in particular mitigation measure B11 which commits to creating biodiversity exclusion zones for:

- identified Plains-wanderer habitat
- identified threatened flora populations, and
- PCTs in disturbance area B that are not of a growth form height that would ever require management.

As per management measure BD12 of the approved Biodiversity Management Plan, please ensure that all biodiversity exclusion zones for Plains-wanderer habitat, threatened flora populations, and PCTs in disturbance area B that are not of a growth form height that would ever require management have been 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.

If you have any questions about this matter, please contact Simon Maffei via planning.southwest@environment.nsw.gov.au or 02 6022 0646.

Regards

Andrew Fisher
Senior Team Leader, Planning - South West
Biodiversity, Conservation and Science
Department of Climate Change, Energy, the Environment and Water
T 02 6022 0623 **M** 0427 562 844 **E** andrew.fisher@environment.nsw.gov.au

dcceew.nsw.gov.au

620 Macauley St
Albury NSW 2640

The South West Planning Team has a new email address. Please contact us about biodiversity and flood management planning matters by emailing planning.southwest@environment.nsw.gov.au

NSW GOVERNMENT

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Saturday, 24 February 2024 12:28 PM
To: Andrew Fisher <Andrew.Fisher@environment.nsw.gov.au>
Subject: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request - BCD

Andrew,

The NSW planning approval (SSI 9172452) for the Project Energy Connect (Eastern Section) requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six monthly audit. The audit is scheduled for late March (2024) and will be undertaken accordance with the Project Approval (Condition D11) that requires:

D11 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.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that BCD may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261
E ken@baeckea.com.au
A PO Box 365 Belrose NSW 2085

Department of Climate Change,
Energy, the Environment and Water

NSW GOVERNMENT

Our ref: DOC24/151175

Your ref: SSI 9172452

Ken Holmes

Director

Barnett & May

ken@baeckea.com.au

Independent Environmental Audit – State Significant Infrastructure

Proposal: Project Energy Connect (Eastern Section)

Major Project reference: SSI 9172452

Received: 24 February 2024

Dear Ken,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for the above State Significant Infrastructure. Thank you for the continued opportunity to comment on the project.

In respect to the scope of audit for Aboriginal cultural heritage, Heritage NSW notes the requirements for the management of sites under the Heritage Management Plan Energy Connect (NSW – Eastern Section) Stage 1 and Stage 2 (7 February 2024) listed by site in Appendix C. Including the requirements for test excavation, salvage excavation, surface collection and site conservation though fencing prior to construction works.

It is recommended that the Department of Climate Change, Energy, the Environment and Water Compliance Team be contacted via info@environment.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions regarding these comments, please contact Alison Lamond, Senior Assessments Officer, at Heritage NSW on 0419 762 918 or alison.lamond@evironment.nsw.gov.au.

Yours sincerely

Nicole Davis

Nicole Davis
Manager Assessments
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under National Parks and Wildlife Act 1974
19 March 2024

From: Susan Appleyard
To: Ken Holmes
Subject: Re: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request - Federation Council
Date: Tuesday, 27 February 2024 10:11:35 AM

Nothing to report for Federation Council of the six months from August 2023 to February 2024.
Regards
Susan

On Sat, 24 Feb 2024 at 12:53, Ken Holmes <Ken@baeckea.com.au> wrote:

> Susan,
>
> The NSW planning approval (SSI 9172452) for the Project Energy Connect (Eastern Section) requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six monthly audit. The audit is scheduled for late March (2024) and will be undertaken accordance with the Project Approval (Condition D11) that requires:
>
> *D11 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.*
>
> The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.
>
> The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that Council may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.
>
> Please do not hesitate to contact me if you require any additional information.
>
> Thanks and Regards,
>
> **Ken Holmes**
>
> **Principal Environmental Auditor**
>
> **Director**
>
> Barnett & May
>
> **P** +61 (0)438 046 261
>
> **E** ken@baeckea.com.au
>
> **A** PO Box 365 Belrose NSW 2085

--

Council also advises:
Federation Council advises that there are significant delays to all applications being lodged for each stage of the

development process.
Staff shortages, in conjunction with the increasing complexity of the NSW Planning Portal Processes required to be undertaken by Council has seen pre-lodgement assessment times increasing to 6-8 weeks and average determination times taking between 10-12 weeks.
We ask you for your cooperation as Council officers concentrate on clearing the backlog of applications while maintaining all other legislated services.

Yours sincerely,

Susan Appleyard
Director Planning Place and Sustainability
P: (02) 6033 8985

Federation Council acknowledges the Traditional Custodians of the land in which we work and live. We pay our respects to elders past, present, and emerging and recognise their continuing connection to the land, waters, and community. We will work together for a united Council that respects this land and values the contribution to our community of the Aboriginal and Torres Strait Islander peoples, their culture, and heritage.

---

federationcouncil.nsw.gov.au 100 Edward St (PO Box 77), Corowa NSW 2646

Federation Council Banner

From:	Woods, Darryl
To:	Ken Holmes
Cc:	Andrews, Paige
Subject:	RE: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request - Wagga Wagga Council
Date:	Tuesday, 26 March 2024 5:10:49 PM
Attachments:	FW Your Email of the 20 August 2023 Project Energy Connect (NSW Eastern Section) Independent Audit.msg

Hi Ken,

We made a submission during the previous Audit Process and did not receive feedback or any confirmation that the items we identified were addressed.

To specifically address the points in your request.

1. Council has Environmental Protection Licence 6671 on the site.
2. The site has class streams located on the property and the EIS is ambiguous in identifying the streams and proximity of construction.
3. The EIS states that the minimum distance of the tower from a classified stream is >45m. Transgrid have not provided a design to Wagga Wagga City Council despite numerous requests, however the contractor has provided a design and a tower is within 45m of Boiling Down Creek.

Please see attached previous submissions.

Regards,

Darryl Woods
Executive Manager - Major Projects

1300 292 442
d: +61 2 6926 9430 | **e:** **Woods.Darryl@wagga.nsw.gov.au**
Wagga Wagga City Council · 243 Baylis Street (PO Box 20) · Wagga Wagga NSW 2650

Committed to a thriving, innovative, connected and inclusive city

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Saturday, February 24, 2024 12:41 PM
To: City of Wagga Wagga <Council@wagga.nsw.gov.au>
Subject: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request - Wagga Wagga Council

Attention: David Woods

David,

The NSW planning approval (SSI 9172452) for the Project Energy Connect (Eastern Section) requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six monthly audit. The audit is scheduled for late March (2024) and will be undertaken accordance with the Project Approval (Condition D11) that requires:

D11 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.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that Council may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

P +61 (0)438 046 261
E ken@baeckea.com.au
A PO Box 365 Belrose NSW 2085

From:	Maurice Morgan
To:	Ken Holmes
Subject:	RE: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request TfNSW
Date:	Tuesday, 27 February 2024 5:07:54 PM
Attachments:	image001.png

Ken

What were the findings of the last 6 month audit

Cheers

Maurice Morgan
Team Leader
Community and Place
Regional and Outer Metropolitan – South Region (Wagga Wagga)
Transport for NSW

T (02) 6923 6611 **E** maurice.morgan@transport.nsw.gov.au

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Level 3, 193-195 Morgan Street
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Transport for NSW

OFFICIAL

From: Ken Holmes <Ken@baeckea.com.au>
Sent: Saturday, February 24, 2024 12:31 PM
To: Maurice Morgan <Maurice.MORGAN@transport.nsw.gov.au>
Subject: Project Energy Connect PEC East - Independent Environmental Audit - Consultation Request TfNSW

Maurice,

The NSW planning approval (SSI 9172452) for the Project Energy Connect (Eastern Section) requires that the project proponent commission six monthly Independent Environmental Audits throughout the construction phase of the project. I have been commissioned by the to undertake the next six monthly audit.   The audit is scheduled for late March (2024) and will be undertaken accordance with the Project Approval (Condition D11) that requires:

D11 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.

The Independent Audit Post Approval Requirements (DPIE 2020) require audits to be conducted during the construction of the project (six monthly). The Audit Guidelines also require that the Auditor consults with relevant stakeholders.

The Proponent has provided me with your contact details as the appropriate stakeholder representative. I would therefore appreciate if you could provide me with any information, comments or concerns that TfNSW may have regarding the environmental performance of the construction project over the past six months and provide details of any specific issues you suggest that the Auditor consider.

Please do not hesitate to contact me if you require any additional information.

Thanks and Regards,

Ken Holmes
Principal Environmental Auditor
Director

Barnett & May

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E ken@baeckea.com.au
A **PO Box 365 Belrose NSW 2085**

PEC East Consultation

Teams Meeting with Mark Saddler

Concerned about lack of communication around incidents.
Concerned that further incidents will occur.
Mr Saddler was concerned that the current mapping of culturally sensitive areas may be inaccurate.
He believes that information on the safeguards being implemented by SecureEnergy have not been provided to the RAPs, so he does not understand what their procedures to project cultural heritage.
Mr Saddler is concerned that SecureEnergy / Transgrid do not fully understand cultural sensitivities.

Desired outcomes:

- Immediate notification of relevant RAPs / Land Councils of incidents (in parallel with Archeologists)
- Mr Saddler would like to input into works procedures (in areas where cultural heritage artifacts are located).
- Mr Saddler would like to see green bunting changed to red to make it more visible. Possibly have different colour bunting for Heritage areas (to habitat areas for example).

PEC East Consultation

Telephone Conversation WWLALC

- RAPs from out-of-area are doing survey work on the project.
- The RAPs are not given formal notification of incidents in their area.

Lead Auditor CV

Appendix E

KEN HOLMES

Senior Principal Environmental Consultant

Contact

Email ken@baeckea.com.au

Mobile +61 0438 046 261

Qualifications & professional affiliations

- Bachelor of Science (Industrial Chemistry)
- Master of Applied Science (Waste Management)
- Master of Business Administration (MBA)
- Accredited Lead Environmental Auditor (Exemplar Global #: 14065)

Ken Holmes is an acknowledged industry leader in environmental management, impact assessment and project approvals. His career spans over 30 years and includes experience across Australia, Africa, Europe and South-east Asia.

Ken's extensive Environmental Audit, Infrastructure Planning and Approvals experience includes that preparation of environmental impact statements for major projects, pre-construction approvals, and operations environmental management experience.

He has led large scale projects on major road, rail, renewable energy, mining and water infrastructure projects across Australia. The projects presented below are a sample of the range and complexity of projects that Ken has delivered.

Project experience

Environmental Auditing (Audits completed in the recent years)

Project Energy Connect (2024 – 2025). Ken is currently undertaking the independent environmental audits of construction phase of this major (900km) electricity infrastructure project that consists of high voltage power line and associated infrastructure construction between Wagga Wagga and South Australia.

Hunter Power Project (Construction Phase IEA 2022 - 2025)- Ken has been commissioned to undertake the construction phase independent environmental audits on the Hunter Power Project. The Hnter Power Project is the construction of a new gas fired power station located in the Hunter Valley in NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Environment Protection Licence;

The independent environmental audit are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Kurri Kurri Lateral Pipeline Project (Construction Phase IEA 2023 - 2025)- Ken has been commissioned to undertake the construction phase independent environmental audits on this gas pipeline construction project. The Kurri Kurri pipeline Project is the construction of a new underground gas pipeline that will run from Beresford to the Hunter Power Project located in the Hunter Valley in NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Environment Protection Licence;

The independent environmental audits are being undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

As auditor, Ken's role covers all technical areas including construction management, waste, greenhouse gas, surface water management, air quality and noise management.

Dargues Gold Mine IEA (2023)- Ken led the independent environmental audit of environmental compliance audit of the this gold mining project located near Braidwood in southern NSW. The conditions of approval for the mine requires a two-yearly independent environmental audit of compliance against:

- **DP&E Conditions of Approval / Development Approvals;**
- **Water Licences;**
- **Environment Protection Licences;**
- **Mining Leases;**

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Mt Thorley / Warkworth Mine IEA (2023)- Ken led the independent environmental audit of environmental compliance audit of the this large mining complex located in the Hunter Valley, NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases;

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

Hera Gold Mine (2019 and 2023)- Ken led the independent environmental audits for the environmental compliance audit of the Hera Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Bingo Industries Eastern Creek Resource Recovery Facility and Landfill (2022) - Ken led the environmental compliance audit of Bingo's Resource Recovery Facility and Landfill located in western Sydney. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- DP&E (NSW) Conditions of Approval / Development Approvals;
- Environment Protection Licence.

The Audit also included an odour audit and surface water audits undertaken by specialists within the audit team.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in air quality and noise management.

McArthur River Mine (Northern Territory) (2022) - Ken is currently leading the environmental compliance audit of McArthur River Mine in the Cape of Carpentaria, NT. EPBC Approval requires an annual independent environmental audit of compliance against that Approval.

The independent environmental audit is being undertaken in accordance with AS/NZS ISO 19011:2014 and the DAWE Audit Guidelines.

Moolarben Coal Mine (2022) - Ken led the environmental compliance audit of Moolarben Coal Mine located near Mudgee in Western NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- EPBC Approval
- DP&E (NSW) Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence; and all
- Mining Leases.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management, air quality and noise management.

Bingo Industries Mortdale Resource Recovery Facility (2022) - Ken undertook the environmental compliance audit of waste recycling plant and transfer station located in Mortdale, NSW. The conditions of project's Planning Approval requires a three-yearly independent environmental audit of compliance against:

- DP&E (NSW) Conditions of Approval / Development Approvals;
- Environment Protection Licence.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines and the EPBC element of the audit against the DAWE Audit Guidelines.

Victoria Cross Station Over Station Development (2023 – ongoing series of annual independent audits to 2025) - Ken is currently undertaking the environmental compliance audits of this landmark construction project in the North Sydney CBD. The conditions of project's Planning Approval requires six monthly independent environmental audits of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Martin Place Over Station Development (2020 – 2023) - Ken undertook the environmental compliance audits of this landmark construction project in the Sydney CBD. The conditions of project's Planning Approval required annual independent environmental audit of compliance against the DP&E (NSW) Conditions of Approval. The project is part of the development of Sydney's commuter rail network expansion.

Client: Port Waratah Coal Loader (2018 and 2021)- Ken was the lead auditor for the last two independent environmental compliance audits of the Port Waratah Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the facility requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

These independent environmental audits were undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water, air quality and noise management.

North Parkes Mine (2021)- Ken was the lead auditor for the environmental compliance audit of the North Parkes Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Metropolitan Coal Mine (2018, 2021 and 2024)

Ken was the independent environmental auditor for the last three independent environmental compliance audits of the Metropolitan Coal Mine south of Sydney, NSW. These conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Commonwealth Approvals;
- Water Licences;
- Environment Protection Licences;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

In addition to his role as lead auditor managing a multidisciplinary team, Ken covered the role as technical expert in surface water management (covering the mine infrastructure areas), air quality and noise management.

Stratford and Duralie Coal Mines – (2020) Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Ashton Coal Mine (2020) - Ken was the lead auditor for the environmental compliance audit of Ashton Coal Mine in the Hunter Valley. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Newcastle Coal Infrastructure Group (2019 and 2022) - Ken was the lead auditor for the environmental compliance audits of the NCIG Coal Loader located on Kooragang Island near Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- EPBC Approvals;
- Water Licences;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Kables Sand Quarry EPBC Audit (2019) – Ken was the auditor for the EPBC audit of Hansons Kables Sand Quarry located in the Blue Mountains in NSW. The audit was a requirement of the project EPBC approval and was undertaken in accordance with the DAWE Audit Guidelines.

Bendicts Recycling Mayfield) (2019)- Ken was the lead auditor for the environmental compliance audit of the Benedicts waste facility in Newcastle. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Triton Copper Mine (2018) - Ken was the lead auditor for the environmental compliance audit of the Triton Gold Mine in western NSW. The conditions of approval for the mine requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Water Licences;
- Environment Protection Licence;
- Mining Leases; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Oberon Quarries (2019) - Ken was the lead auditor for the environmental compliance audit of this Gravel Quarry located in near Oberon in western NSW. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Sibelco Dunes Sand Mine (2018 / 2019) – **Ken** was the auditor for the environmental compliance audit of the Sibelco Sand located near Nelson Bay in NSW. The conditions of approval for the mine required an independent environmental audit of against:

- DP&E Conditions of Approval / Development Approvals;
- EIS predications against actual impacts.

The Approval required that the audit be conducted within 12 months of completion of mining and focussed on mine site rehabilitation.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines

Ardglen Quarry (Daracon) (2018) - Ken was the lead auditor for the environmental compliance audit of the Ardglen Gravel Quarry located in the upper Hunter Valley. The conditions of approval for the quarry requires a three-yearly independent environmental audit of compliance against:

- DP&E Conditions of Approval / Development Approvals;
- Environment Protection Licence; and the
- EIS (Statement of Commitments).

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

Holcim Hume Quarry (2017/8) - Ken was auditor for the environmental compliance audit of Holcim' hard rock quarry located near Queanbeyan in NSW. Ken undertook the compliance audits of the quarry's Conditions of Approval. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals
- Water Licences
- Environment Protection Licences.

The independent environmental audit was undertaken in accordance with AS/NZS ISO 19011:2014 and the Department of Planning and NSW EPA audit guidelines.

PGH Bricks (2017/8) - Ken was the lead auditor for the environmental compliance audits of PGH's NSW, QLD, Vic and SA quarries. Ken undertook the compliance audits of the quarries as required by the Conditions of Approval for each site. The conditions of approval required a detailed assessment of compliance against:

- DP&E Conditions of Approval / Development Approvals (for non-NSW sites)
- Mining (and Exploration) Leases
- Environment Protection Licences (or equivalent)

Enviroking (2017/8) - Ken was the lead auditor for an independent environmental audit undertaken in accordance with AS/NZS ISO 19011:2014 "Guidelines for auditing management systems" for the liquid waste facility. The audit reviewed Enviroking's compliance with conditions of approval, made recommendations to address non-compliances and identified opportunities for improvement in the project's environmental management and performance.

Ken has also undertaken compliance audits for a wide range of industries and projects including:

- Cowal Gold Mine
- Manildra Limited / Castlereagh Coal
- Bougainville Copper Limited (Bougainville, PNG)
- News Limited
- Fairfax News Papers
- Norske Skog
- Alcoa
- Ok Tedi Mining (PNG)
- Albright & Wilson
- Seafood Specialities
- Rio Tinto
- Hunter Water
- Department of Foreign Affairs and Trade

- Sydney Water
- Transport for NSW
- Mount Isa Mines
- Scott Transport
- Roads and Traffic Authority (now Roads and Maritime Services)
- AbiGroup (now LendLease)
- Leighton Contractors (now CPB Contractors)
- John Holland Group
- Queensland Transport
- PMP (Printing)
- Straits Resources
- Mount Isa Mines
- Philips (electronics)
- Bonlac Foods
- BHP

Ken has also led a wide range of Acquisition / Due Diligence audits for private sector clients in Australia, PNG, Africa, South Pacific, New Zealand, China, Singapore, Indonesia, Thailand.

Project Approvals

Central Station Re-development – Transport for NSW - Ken led the team responsible for gaining the environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Central Station project. In this role, Ken was responsible for the interpretation of the Approval requirements (Minister's Conditions of Approval) and the provision of strategic advice on the approvals, licencing, construction environmental management and stakeholder management.

Sydney Metro – Transport for NSW - Transport for NSW (TfNSW) commissioned two demolition contractors to demolish a number of multistorey buildings within the Sydney CBD in preparation for the construction of the Sydney Metro project. Ken led the team responsible for the preparation of environmental management plans for these works (TfNSW was not comfortable that the demolition contractors had the appropriate skills to prepare the required plans and gain the required approvals for the works). Ken worked with the demolition contractors to streamline their internal management processes and to add the requisite environmental management functions within both their corporate and project management systems.

M2 Widening Project Approvals (Roads and Maritime Services) – Ken (Project Manager) led the environmental approvals team for the preparation of the Environmental Impact Assessment and construction approvals (preparation of EMPs /construction licence etc.) for the M2 widening project.

The management and minimisation of vegetation clearing on this project (along with the minimisation of impacts on residents a high priority. Ken oversaw all the specialist studies that supported the preparation of the Environmental Impact Assessment and subsequent Environmental Management Plans, including:

- Ecological survey;
- Tree reports;
- Noise and vibration impact assessments;
- Contamination assessments;
- Traffic impact assessments; and
- Ground and surface water impact assessments.

Sydney Light Rail – Acciona / Transport for NSW - Ken led the team responsible for leading the construction approvals program and setting up the environmental management system for this significant brown fields infrastructure construction project. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Acciona management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for the Sydney Light Rail project. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal (Acciona / KMH) document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Ken also led the consultation with the NSW Government regulators and supported and mentored the Acciona Construction Environmental Manager. In addition, Ken personally led the community and business reference group consultation process on behalf of the design and construction joint venture, successfully gaining signoff from these consultation bodies on the environmental plans and strategies.

Environmental Management Representative (ER) - The role of Independent Environmental Representative on major infrastructure projects in NSW was established in 1998 and continues to be a requirement of the Conditions of Approval for all major infrastructure projects in NSW. The appointees are nominated by the project proponent or construction consortium but are approved by and report to the Director General of the Department of Planning and Environment (DPE).

- The scope of the ER's role is broad range and includes:

- Interpreting and advising on requirements of the Project Approval.
- Reviewing and assessing the performance of the project against the Conditions of Approval, Project Deed and other relevant project related approvals. In that role, the ER reviews and approves all environmental related plans (EMPs), audits the implementation of environmental management plans and strategies, verifies (through audit and surveillance) compliance with the relevant project approval and project deed requirements, monitors and reports on regulatory compliance and provides reports to the Department and the project proponent on these matters.

- Reports on compliance related issues to the public and investigates environmental and compliance issues, complaints and incidents.
- Review and approval of vegetation clearing and other high (environmentally) impact activities.

Ken has fulfilled the role of Independent Representative on seven major infrastructure projects:

- Hunter Expressway (Motorway construction, Hunter Valley) - (2011 – 2013)
- Integral Energy 9JA Project (Transmission Line Construction Western Sydney) - (2006-2007)
- Westlink M7 (40km Motorway project, Western Sydney) - (2003-2005)
- Towra Beach Nourishment Project (Wet land protection, dredging project, Botany Bay) - (2004)
- Warragamba Dam Auxiliary Spillway Project– (1998 – 2013)
- Cronulla Sewage Treatment Plant Upgrade – (1998 – 2000)
- Liverpool Sewage Treatment Plant Upgrade – (2000)

Upper Hunter Valley Alliance (UHVA) – Leighton Contractors /ARTC - Ken led the team responsible for the provision of the environmental approvals (preparation of EMPs /construction licences etc.) on this major ARTC rail infrastructure program in the Hunter Valley of New South Wales. Ken's team on this project provided the entire environment and community and stakeholder team as a Sub-Alliance partner. In this role, Ken provides strategic advice on the approvals, licencing, construction environmental management and stakeholder management. His responsibilities included:

- Establishing the project Environmental Management System;
- Interpreting the Conditions of Approval and the Project Deed and advising the Leighton management team on all aspects of compliance with those key approval and contractual documents;
- Gaining the construction environmental approvals (preparation of EMPs /construction licences etc.) for range of projects delivered by the Alliance. In this role, Ken provided strategic advice on the approvals, licencing, construction environmental management and stakeholder management. He was also responsible for all internal document quality control.
- Selecting, commissioning and supervising the wide range of specialist environment service providers including ecological survey, tree reports, and pre-construction vegetation clearance reports.
- Advising the design and construction teams on tree clearing and management and integration of construction requirements into the flora and fauna management plans.

Other relevant Infrastructure Projects led by Ken include:

- Joint Defence Headquarter Construction Project (ACT) – Environment Approvals Manager
- Melbourne Desalination Plant Project – EMP preparation
- Ballina Bypass (Pacific Highway construction project) - Environment Approvals Manager
- Northern Hume Alliance (Hume Highway Duplication) - Environment Approvals and Community Manager
- Anvil Hill Coal Mine (Hunter Valley) - Environment Approvals Manager
- Shannon Creek Dam Construction Project - Environment Approvals and Community Manager
- Liverpool to Ashfield Pipeline Project (Sydney Water) - Environmental Approvals Manager
- Networks Alliance (Sydney Water –water and sewage mains renewals project) – KMH Management Representative
- Technical Reviewer and Economic Impact Analyst – DEC Construction Noise Management Guidelines (2006)
- Northwest Transit Way - Environment Approvals Manager
- Lane Cove Tunnel - Environment Advisor to Approvals and Construction Team
- North Connex – Environmental Management Plan preparation, consistency assessments and preparation of Environmental Impact Assessments to support variations to the project approvals
- Sydney Desal Plant -Internal QA Reviewer
- Keepit Dam Safety Upgrade – Project Director
- Cordeaux Water Treatment Plant – Lead Consultant and Project Manager

Investigative / Expert Roles

Minter Ellison – Expert Opinion / Report (2018/9) - Ken was commissioned by Minter Ellison on behalf of their client (a consortium of major construction contractors) to provide an expert opinion regarding the interpretation of impact of changes to the Conditions of Approval for a major Sydney linear infrastructure project on environmental investigation and reporting obligations and project cost impacts. This expert opinion was commissioned to support the resolution of a contractual dispute between the consortium and their client.

Environment Protection Authority — Investigation of Illegal Land Clearing and Waste Disposal Activities (April 2015 – July 2017) - Ken was the lead auditor for the investigations undertaken by the KMH team commissioned by the NSW Environment Protection Authority (EPA) to investigate an alleged illegal vegetation clearing and waste disposal operations located in the Hunter Valley, Hawkesbury River Basin and Arcadia (north western Sydney). Ken developed and supervised the implementation site investigation strategies that included a series of investigative processes designed to identify the location and extent of vegetation clearing, and to determine the depth and volumes of buried construction and demolition wastes.

Environment Protection Authority — Expert Reports Illegal Land Clearing and Waste Disposal Activities (2018) - Ken was commissioned by the NSW Environment Protection Authority (EPA) to provide expert opinion regarding the alleged illegal vegetation clearing and waste disposal at a site in the Hawkesbury River Basin and Arcadia (north western

Sydney).

Ken was subsequently briefed to provide expert opinion in the legal actions taken by the EPA in these matters.

Qenos Mandatory Environmental Audit - Ken was commissioned as the Expert Independent Environmental Auditor (Lead Auditor) for the Qenos Mandatory Audit. As a result of a series of environmental incidents, Qenos were required by the NSW EPA to commission an independent auditor to determine if the plant is capable of being operated and maintained and if the plant is being competently operated and maintained, in order to minimise the risk of environmental incidents and better protect the environment.

In doing this, the audit Assessed the:

- adequacy of Risk Assessment procedures and practices
- adequacy of maintenance and operational Systems
- physical condition and reliability of the Plant
- adequacy and suitability of environmental risk management
- adequacy and suitability of performance monitoring equipment
- processes and procedures for identifying and rectifying plant and equipment issues.

Incidents and assessed of the adequacy the investigations and responses to those incidents.

Orica Port Botany Ground Water Remediation Project – Expert Auditor - Ken was the lead auditor for the independent compliance audit of the Orica groundwater remediation project. These annual audits were a condition of licence established by the (then) Department of Environment and Climate Change and the Department of Planning.

Other

Kelian Equatorial Mining (Kalimantan, Indonesia) - Ken led a specialist environmental and social impact audit team that was established by Rio Tinto (and approved by the Government) to investigate and report on the environmental and social impacts associated with alluvial mining operations (downstream) from the Rio Tinto (major owner) operated gold mine located in the remote, mountainous region of Kalimantan. The audit team included Government representatives and was undertaken to address the concerns of local village communities that were being impacted socially and economically.

Bougainville Copper Limited (Bougainville, PNG) - Ken led two specialist projects for Bougainville Copper Limited. Including Investigation of the Loloho Port Facility on Bougainville Island. Ken lead the investigation team commissioned to identify and plan for the clean-up of hazardous chemicals left after BCL evacuated Bougainville at the commencement of the civil war in 1990. The investigation covered gases, PCBs, and minerals processing chemicals. The second project was clean up and destruction of chlorine and other compressed gases located at the Loloho Port facility on Bougainville Island.

Ken subsequently lead a team dispatched to Bougainville to chemically destroy 1 tonne of chlorine and other toxic gases. The team built a treatment plant on site and successfully removed the toxic gas threat.

Waste Management

Review of Energy to Waste Technologies – Client Confidential (Australian Based Waste Management Company)

Ken participated (as technical reviewer) in the preparation of a technical review of energy to waste technologies for a major waste management group operating in Australia. The purpose of the review has to provide the client with a detailed assessment of all available and emerging energy to waste technologies available including determining the barriers to implementation within the Australian market, political and social framework.

Shredder Waste Disposal Assessment – Sims Metal

Metal shredders produce a complex waste stream consisting of a mixture of plastic, rubber, metal and other materials that is costly to dispose of. Ken led the KMH team that researched the options for management of this waste stream and prepared recommendations for the development of waste treatment and disposal options (including energy extraction) for Sims Metal.