SNOWY 2.0 TRANSMISSION CONNECTION PROJECT

Independent Environmental Audit
Construction Audit 3

FINAL

July 2025

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Construction Audit 3

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Prepared by
Umwelt (Australia) Pty Limited
on behalf of
Transgrid

Lead Auditor: Daniel Sullivan
Assistant Auditor: Joshua Wheatley
Report No. 22930/R03
Date: July 2025

This report was prepared using Umwelt's ISO 9001 certified Quality Management System.

Acknowledgement of Country

Umwelt would like to acknowledge the traditional custodians of the country on which we work and pay respect to their cultural heritage, beliefs, and continuing relationship with the land. We pay our respect to the Elders – past, present, and future.

Document Status

Rev No.	Reviewer		Approved for Issue	
	Name	Date	Name	Date
V1	Daniel Sullivan	15 April 2025	Daniel Sullivan	16 April 2025
V2	Daniel Sullivan	12 June 2025	Daniel Sullivan	13 June 2025
V3	Daniel Sullivan	03 July 2025	Daniel Sullivan	03 July 2025

Executive Summary

Umwelt was commissioned by Transgrid to conduct the third construction Independent Environmental Audit (IEA) against infrastructure Approval SSI 9717 - MOD 1 for the Snowy 2.0 Transmission Connection Project. This audit was undertaken for the Department of Planning, Housing and Infrastructure (DPHI) for the period 27 September 2024 to 13 March 2025 (audit period). The audit also assessed compliance with the conditions of the Projects Environment Protection and Biodiversity Conservation Act (EPBC) Approval, management plans and other licence documents.

The audit team responsible for completing the audit as endorsed by DPHI included:

- Daniel Sullivan (Lead Auditor) (Exemplar Global International Certified Lead Auditor 113202)
- Joshua Wheatley (Assistant Auditor) (Exemplar Global International Certified Lead Auditor 459118)
- Jacob Manners (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Erosion and Sediment Control).

The audit consisted of a detailed desktop review and onsite audit including interviews with key Transgrid and UGL staff, and contractors and a site inspection which assessed the compliance status of the Snowy 2.0 Transmission Connection Project against the Infrastructure Approval for all construction activities that have occurred within the audit period. The site audit was conducted across the 11 – 13 March 2025.

The audit was conducted generally consistent with '*AS/NZS ISO 19011:2018 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing* and the *NSW Department of Planning, Industry & Environment's Independent Audit – Post Approval Requirements* dated May 2020 (Independent Audit Requirements)'.

This audit has concluded that the on the ground environmental management practices being applied at Snowy 2.0 Transmission Connection Project are appropriate. The Maragle (West) and Lobbs Hole (East) Project Areas were assessed during the field inspection and were observed to be well managed with supervisory personnel demonstrating a good understanding of management actions required to minimise environmental impacts from construction activities including the specific measures to manage and minimise biodiversity, Aboriginal cultural heritage and water/sediment and erosion control related impacts.

This audit has concluded that the environmental management practices being applied at the Snowy Hydro 2.0 Transmission Connection Project are appropriate and a reasonable level of environmental compliance is being achieved. All areas of the site that were visited during the site inspection were observed to be well maintained and managed with site personnel demonstrating a good understanding of management actions and responsibilities to minimise impacts from construction activities.

Non-compliances identified during this audit are summarised in **Section 4.0**. The majority of the non-compliances identified are not considered to have resulted in material environmental harm. However it is considered that the non-compliances related to condition B21 (biodiversity management) particularly those related to the management of partial clearing areas and the use of inappropriate clearing methods have the potential to have resulted in environmental harm (as defined under the Infrastructure Approval). It is considered that the extent of the impacts will require remedial actions to address.

A review of management plans found that all required plans were in place and generally being implemented.

A number of recommendations and opportunities for improvement arising from a review of environmental management documentation, the audit site inspection and identified non-compliances are provided in **Section 6.0**.

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1.0 Introduction

On 2 September 2022 Transgrid were granted Infrastructure Approval SSI 9717 for the Snowy Hydro 2.0 Transmission Connection Project (the Project). The Infrastructure Approval for SSI 9717 allows for the construction and operation of new 330 kilovolt (kV) transmission lines and associated infrastructure connecting the Snowy 2.0 Main Works Project to the existing electricity grid. A modification of the Infrastructure Approval was determined on 30 August 2024 (MOD 1). MOD 1 sought to provide a 12-month extended period for Snowy Hydro to implement and deliver the biodiversity offset measures set out in the approved Biodiversity Offset Package to account for the delays experienced in the process.

Transgrid is responsible for the management of the Project and have awarded the design and construction contract to UGL (a national engineering and services provider) to complete the construction phase of the Project.

Transgrid commissioned Umwelt to conduct an Independent Environmental Audit (IEA) as required by Part C, Condition 10 of SSI 9717 – MOD 1. The IEA was conducted in accordance with SSI 9717 – MOD 1, NSW Government's *Independent Audit – Post Approval Requirements* (Independent Audit Requirements) and with *AS/NZS ISO 19011:2018 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing*. As per the requirements stated under Condition C10 in SSI 9717 – MOD 1:

"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."

In accordance with the requirements of Condition C10, the Third Construction Audit was completed within six months of the completion of the Second Construction Audit.

This IEA was conducted by Daniel Sullivan (Exemplar Global International Certified Lead Auditor 113202) and Joshua Wheatley (Exemplar Global International Certified Lead Auditor 459118) from Umwelt. Daniel and Joshua were supported during the audit by experts in a number of fields including:

- Jacob Manners (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Erosion and Sediment Control).

This IEA report has been certified by the lead auditor (see **Appendix 1**) as required by the Independent Audit requirements. As required by the Infrastructure Approval, the audit team was approved by DPHI to undertake the audit (refer to **Appendix 2**). The IEA consisted of a detailed desktop review and onsite component including a site inspection and assessed the compliance status of Snowy 2.0 Transmission Connection Project against the Infrastructure Approval and other relevant environmental approvals and licences, for construction occurring between 27 September 2024 and 13 March 2025 (the audit period). The site inspection of the IEA was undertaken between the 11 - 13 March 2025 (see **Appendix 3** for the audit plan and itinerary).

Some information requested by the audit team was not available on-site at the time of the audit and was subsequently collated and provided following the site audit to the audit team for review. The weather conditions during the site inspection of this IEA were fine and sunny onsite for the duration of the site visit.

The temperature exceeded 30°C across all three days whilst onsite with temperature on the 13 March 2025 reaching a maximum of 32°C (Tumbarumba Post Office BoM monitoring station site 072043). In the week preceding the site inspection, conditions were relatively dry, with no rainfall recorded at the Tumbarumba Post Office BoM monitoring station.

An opening meeting and close out meeting for the IEA was held on site at the Maragle Construction Compound, with the option for Transgrid and UGL employee to join via Microsoft teams. Transgrid and UGL environmental management team were in attendance at the opening meeting and closing meeting.

This report provides an outline of the IEA methodology and results and provides recommended actions for achieving full compliance with environmental approvals.

1.1 Audit Scope and Objectives

The scope and objectives of the IEA were to assess Transgrid's compliance with:

- All conditions of the Infrastructure Approval for SSI 9717 – MOD 1 (dated 30 August 2024).
- All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans.
- All environmental licences and approvals applicable to the Project.

The audit also included:

- A review of the environmental performance of the Project (including a comparison with the predicted impacts contained in the EIS, review of complaints and incidents registers and consideration of any feedback provided during agency consultation).
- A high-level assessment of whether Environmental Management Plans and sub-plans are adequate.
- Any other matters considered relevant by the auditor or the Department as raised during the pre-audit consultation.

1.1.1 Supporting Approvals

The other approvals and statutory documents held by Transgrid for the Project which have been reviewed as part of this IEA include:

- EPBC Approval 2018/8363.
- Water Access Licence (WAL44782 and WAL44788).
- Any strategy, plan or program which has been prepared for the Project.

1.1.2 Supporting Documents

In addition to assessing compliance against each of the conditions of the Infrastructure Approval for SSI 9717 – MOD 1 the following documents have also been reviewed as part of this IEA:

- All post approval and compliance documents prepared to satisfy the conditions of consent which include the:
    - Biodiversity Management Plan
    - Biodiversity Offset Package
    - Complaints Management System
    - Complaints Register
    - Construction Environmental Management Plan (CEMP) and all sub-plans
    - Emergency Plan
    - Environmental Management Strategy
    - Final Layout Plans
    - Heritage Management Plan
    - Notification of commencement of development, construction, operations, upgrading or decommissioning
    - Notification of Incident
    - Notification of Non-Compliance
    - Spoil Management Plan
    - Traffic and Transport Management Plan
    - Transport Strategy
    - Visual Impact Management Plan
    - Additional Easement Rehabilitation Strategy
    - Water Management Plan
    - Work as Executed Plans.

1.2 Audit Criteria - Compliance Status Descriptors

The compliance status of each approval was assessed in accordance with the compliance assessment criteria detailed within the Independent Audit Requirements and as directed in the letter from DPHI approving the audit team. The criteria have been reproduced in **Table 1.1** below.

Table 1.1 Independent Audit Guidelines Compliance Assessment Criteria

Assessment	Criteria
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non- compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

1.3 Structure of this Document

This report contains the following sections:

Section 1.0 – *Introduction*. An overview of the Project and the purpose and scope of the audit

Section 2.0 – *Audit Methodology*. A detailed description of the audit process

Section 3.0 – *Previous Independent Audit Recommendations and Status*. An overview of the findings of the previous audit and the action status of each recommendation.

Section 4.0 – *Compliance Assessment*. An overview of the findings of the audit, including detailed descriptions of any non-compliance identified

Section 5.0 – *Environmental Performance*

Section 6.0– *Recommendations and Opportunities for Improvement*

Appendix 1 – *Independent Audit Declaration Form*

Appendix 2 – *DPHI Correspondence Approving the Auditor*

Appendix 3 – *Audit Plan and Itinerary*

Appendix 4 – *Compliance Tables for the Infrastructure Approval, BMP Management Commitments, EPBC Approval, Amendment Report Commitments*

Appendix 5 – *Photographic Plates*. Photographs of key site features referred to in this report.

2.0 Audit Methodology

The audit process involved the interview of personnel and relevant agencies, a review of documentation and samples of records provided by Transgrid. The site audit also included an inspection of the construction activities being undertaken across the Project Area to determine the level of environmental performance and compliance.

2.1 Audit Team

The audit team was led by Daniel Sullivan, a qualified and highly experienced lead environmental auditor, who has undertaken a number of DPHI independent environmental audits for infrastructure projects in NSW. Daniel was approved by DPHI to act as the lead auditor for the Project. Joshua Wheatley was approved by DPHI to act as the environmental auditor. DPHI approved the following experts to review their respective areas including:

- Jacob Manners (Biodiversity)
- Luke Wolfe (Aboriginal Cultural Heritage) and
- Melissa Swan (Surface Water/Erosion and Sediment Control).

A copy of the independent audit certification form as required by the NSW Audit Guidelines is included within **Appendix 1** with the DPHI correspondence approving the audit team included within **Appendix 2**.

2.2 Agency Consultation

Consistent with correspondence with DPHI during the planning phase for the previous Construction Audits, the audit team for the Third Construction Audit comprises of suitably qualified and experienced specialists in the areas of Biodiversity, Aboriginal Cultural Heritage and Water/Sediment and Erosion Control. All specialists in the audit team are approved by DPHI as described in **Section 1.0**.

Further to the above as required by the Independent Audit Requirements during the audit teams' preparation for this IEA, input was sought from regulatory agencies to confirm any areas of compliance or environmental management at Snowy Hydro 2.0 Connection Project that should be a particular focus. As requested by DPHI the following agencies were contacted and invited to provide input as part of the scoping phase of this Audit:

- NSW Department of Planning, Housing and Infrastructure (DPHI)
- NSW Department of Primary Industries (DPI)
- NSW Rural Fire Service (RFS)
- Fire and Rescue NSW
- Heritage NSW
- Local Aboriginal Councils

- NSW Department of Planning and Environment—Water (DPE Water)
- Australian Government Department of Climate Change, Energy, the Environment and Water (AG DCCEEW)
- Forestry Corporation of NSW (FCNSW)
- NSW Environmental Protection Agency (EPA)
- Transport for NSW (TfNSW)
- Conservation Programs, Heritage and Regulation Group (CPHR) formerly Biodiversity Conservation Science
- Snowy Monaro Regional Council (SMRC)
- Snowy Valleys Council (SVC)
- National Park and Wildlife Services (NPWS).

An overview of the agency consultation is included in **Table 2.1**. Representatives from, DPHI, CPHR, NPWS, EPA, Fire and Rescue and TfNSW responded and provided feedback regarding items to be addressed in addition to the requirements of the Project Approval with their responses summarised in **Table 2.1** below. SMRC responded noting that they did not have any particular issues or areas to raise as requiring specific attention during the audit. No responses were received from SVC, RFS, AG DCCEEW, DPI, FCNSW, Heritage NSW, DPE Water and local Aboriginal Council.

Table 2.1 Stakeholder Consultation

Stakeholder	Person Contacted	Agency Comments	Section where Addressed
CPHR	**Andrew Fisher** *Senior Team Leader, Planning - South West Regional Delivery*	Before the audit is started, CPHR request a discussion with Jacob Manners to ensure the issues raised below about partial clearing during construction are adequately addressed by the audit.	Meeting held between Umwelt and CPHR on 4 March 2025. Issues raised in the meeting are addressed in **Section 5.4**.
		CPHR notes that the condition of consent referred to in the email below is the one dated 2 September 2022. A project modification was determined on 30 August 2024 for this project (SSD 9717-MOD1) which resulted in an updated consolidated consent. While this does not change the audit requirements at condition C10, it has extended the timing for biodiversity offset measures to be implemented and delivered to 1 September 2025.	Noted.
		CHPR has provided comments on the recommendations related to Condition B21 that were made during the Construction Audit 2.	**Section 5.4** provides detailed responses to each concern raised.

Stakeholder	Person Contacted	Agency Comments	Section where Addressed
DPHI	**Katrina O'Reilly** *Team Leader Development Assessment*	The department would also like to see areas such as erosion and sediment control,	**Section 5.6**
		biodiversity management,	**Section 5.4**
		compliance with partial clearing criteria	**Section 5.4**
		and monitoring and reporting requirements in relation to the partial clearing (as per condition, BMP and EIS)	**Section 5.4**
		and road network monitoring and maintenance.	**Appendix 4**
		The experts must attend site (unless otherwise agreed to by the secretary) and the IEA report must include sections (and/or an appended report) prepared by the experts which addresses their assessment of compliance (and recommendations for improvements) in respect to the conditions, management plans and other matters considered relevant for their areas of expertise.	Noted
EPA	**Chritina McInally** *Operations Officer Regulatory Operations*	From the EPA's perspective, the primary focus is to ensure that the Projects erosion and sediment controls meet the high level of protection required to uphold the significant environmental values of the Kosciuszko National Park. It is important to note that the Environment Protection Licence for the Project does not authorise discharge to waters. Due to this continuing primary focus, the proposed scope input remains the same as previously given for Audit 2. Please refer to the attached correspondence related to Audit 2 for further details and specific advice provided to Transgrid.	**Section 5.6** **Appendix 4**
		Furthermore, the EPA has been working collaboratively with Transgrid to ensure that environmental incidents are investigated and reported appropriately. In November 2024, the EPA issued correspondence (attached) to Transgrid regarding incident reporting requirements. It is recommended that compliance with these investigation and reporting requirements be incorporated into the audit scope.	**Section 5.3.2** **Appendix 4**
		EPA recommends the audit assess the need for enhanced sediment and erosion controls which go beyond industry standards (such as those prescribed by the blue book / white book).	**Section 5.6** **Appendix 4**
		EPA recommends the audit review procedures to be implemented pre, post and during rain events to minimise sediment discharge into the sediment basins or receiving waters.	**Section 5.6** **Appendix 4**
		EPA recommends the audit review procedures for the reuse of captured site water that prioritise alternatives to discharging into receiving waterways, such as dust suppression or on-site irrigation.	**Appendix 4**

Stakeholder	Person Contacted	Agency Comments	Section where Addressed
		EPA requests the audit review the implementation of the Trigger Action Response Plan (TARP), which includes the requirement to notify the EPA of any pollution incident. The TARP also requires that any water quality monitoring result indicating an exceedance of the Water Quality Objectives is appropriately notified, investigated, and measures to prevent a recurrence are evaluated.	**Section 5.6** **Appendix 4**
Fire and Rescue	**Mark Cavanough** *Superintendent / Zone Commander*	Main risks for FRNSW are:	
		Bushfire	**Appendix 4**
		Evacuation challenges in an emergency	**Appendix 4**
NPWS	**Kelsey Boreham** *A/Manager Snowy 2.0*	In terms of specific issues you could consider in your upcoming audit, we suggest the following: Management Planning - Progress in finalising and implementing management plans required by the CSSI approval.	**Appendix 4**
		ERSED Incidents - Review of off-site sediment release incidents in known problem areas of the project, e.g. Track 8, Track 2 and Booroolong frog habitat on Sheep Station Creek. Consider reporting, follow-up and adaptive management actions taken.	**Section 5.3.2** **Section 5.4** **Appendix 4**
		Road Safety – Evidence of Australian Standards compliance for road furniture and safety infrastructure being installed along public roads such as the Elliott Way.	**Appendix 4**
		Clearing Thresholds - Evidence of adherence to the clearing thresholds in CSSI 9717 Conditions A6 and A32.	**Section 5.4**
		Pest and Weed Management – Planning/program documentation and adaptive management arrangements for pest and weed control programs within the project area.	**Section 5.4**
TfNSW	**Glen Hanchard** *Development Services Case Officer - Renewables*	Thankyou for providing TfNSW an opportunity to comment on the construction Audit for Snowy Hydro 2.0. TfNSW requires the project to be compliant with the agreed to conditions of consent of SSI-9717 determined 02/09/2022. Condition B25 onwards, as provided below, specify the Traffic and Transport conditions that were levied on the consent.	**Appendix 4**

2.3 Site Interviews and Inspections

The opening meeting was held at the UGL Maragle Project Construction Compound and online to personnel who could not attend onsite commencing at 9:00 am on 11 March 2025. The list of participants is provided in Table 2.2.

Table 2.2 Opening Meeting Attendees

Person	Organisation	Title / Role
Jason Snape	Transgrid	Senior Environmental Advisor
Bredan Toohey	UGL	Environmental Manager
Camille Palmer	UGL	Senior Environmental Advisor
Sarah Steele	Treestone Environmental	CPESC Advisor
Lauren Logue	UGL	Environmental Advisor
Peter Monsted	LENECO	Principal Ecologist
Paris Bach	LENECO	Ecologist
Chris Johnson	Transgrid	Environmental Advisor
Andrew Buttigieg	Transgrid	Senior Project Manager
Chris Wooll	Transgrid	Environmental Advisor
Daniel Sullivan	Umwelt	Lead Auditor
Joshua Wheatley	Umwelt	Assistant Auditor

The audit team was introduced, and the scope of their responsibilities was conveyed to the auditees. The purpose, depth and scope of the audit were outlined as per the Audit Plan (refer **Appendix 3**). The methods to be used by the team to conduct the audit were explained. It was stated that the audit team would be interviewing personnel, reviewing site management plans, examining records and conducting a site inspection in order to address specific compliance requirements. Transgrid and UGL personnel were asked to provide an overview of the status of construction and relevant site environmental management measures such as biodiversity management, Aboriginal cultural heritage management, water management and erosion and sediment control.

2.3.1 Audit Interviews

During the site audit, interviews were conducted with relevant Transgrid and UGL staff and identified in **Table 2.3**.

Table 2.3 Personnel Interviewed During the Audit

Person	Organisation	Title / Role
Jason Snape	Transgrid	Senior Environmental Advisor
Bredan Toohey	UGL	Environmental Manager
Chris Wooll	Transgrid	Environmental Advisor
Peter Monsted	LENECO	Principal Ecologist
Chris Johnson	Transgrid	Environmental Advisor
Camille Palmer	UGL	Senior Environmental Advisor
Sarah Steele	Treestone Environmental	CPESC Advisor
Darrell van Bruchem	UGL	Construction Manager West

2.3.2 Data Collection and Verification

Documents and data collated during the audit process were reviewed whilst on-site where possible. A number of documents were also provided to the auditors prior to the on-site component of the audit and documents that were requested during the on-site component of the audit were provided following the on-site component of the audit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and/or site inspections where possible. Where suitable verification could not be provided, this has been identified in the audit findings.

2.3.3 Site Inspection

A comprehensive site inspection of active construction areas was undertaken as part of the audit. During the audit period, works included vegetation clearing along the alignment in Project Area East. As noted in Construction Audit 2, all clearing activities in Project Area West have been completed. Additional works during this period included civil construction activities associated with the Switchyard, access tracks, and tower pads, as well as the construction of gantries and installation of the auxiliary switch room.

The following locations were inspected during the audit:

- Maragle Project Construction Compound
- Maragle Substation Project Area
- Elliott Way/Access Track South Intersection
- Track 1,2 (Sections of Track 2 could not be accessed safely due to barricading and absence of traffic controllers), 4, 5a, 5b, 5c, 6, 7, 8, 9, 10, 12
- Sheep Creek Station Bridge (Temporary)
- Wallaces Creek
- Lobbs Hole Project Construction Compound.

2.3.4 Closing Meeting

The closing meeting was held at the UGL Maragle Project Construction Compound and online to personnel who could not attend onsite commencing at 1:00 pm on 13 March 2025. The objective of this meeting was to discuss outstanding matters, present preliminary findings and outline the process for finalising the compliance assessments and audit report. The list of participants who attended the closing meeting is provided in Table 2.4**.**

Table 2.4 Closing Meeting Attendees

Person	Organisation	Title / Role
Jason Snape	Transgrid	Senior Environmental Advisor
Bredan Toohey	UGL	Environmental Manager
Andrew Buttigieg	Transgrid	Senior Project Manager
Camille Palmer	UGL	Senior Environmental Advisor
Chris Johnson	Transgrid	Environmental Advisor
Lauren Logue	UGL	Environmental Advisor
Camille Palmer	UGL	Senior Environmental Advisor
Daniel Sullivan	Umwelt	Lead Auditor
Joshua Wheatley	Umwelt	Assistant Auditor

2.4 Independent Environmental Audit Reporting

Following completion of the site audit, which included review of Infrastructure Approval conditions and site activities, remaining document reviews and compliance assessments were completed, and site audit notes were reviewed in order to compile a list of outstanding matters to be noted in the audit report.

This report was prepared to provide an overview of the status of compliance by reference to the relevant compliance documentation and any other observations of the audit team during the site inspections and interviews. This report has been prepared on an exception basis, highlighting the compliance issues identified along with any areas where action or improvement is required. This IEA has been prepared in accordance with the Independent Audit Requirements.

2.5 Limitations

The findings of the IEA are based upon visual observations of the site and its vicinity, interviews with site personnel and our interpretation of documentation provided by Transgrid.

Opinions presented herein apply to the site as it existed at the time of the audit and from information provided by site personnel and agencies. Any changes to this information of which Umwelt is not aware and has not had the opportunity to evaluate therefore cannot be considered in this report.

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

3.0 Previous Independent Audit Recommendations and Status

The recommendations made in the Second Construction Audit for Snowy 2.0 Transmission Works Project Independent Environmental Audit (Umwelt, 2024) and the status of the recommendations as of 13 March 2025 are detailed in Table 3.1. Outstanding recommendations from the Initial Construction Audit have also been included to provide an update on their status.

Table 3.1 Previous Audit Findings Update

Condition / Issue	Previous Construction Audit - Recommendations	Transgrid Status Update
Infrastructure Approval		
B8 (h)	It is recommended Section 6 of the Spoil Management Plan be revised to include details to explain how the management of spoil and the progress against the detailed completion criteria and performance indicators would be publicly reported.	Not yet actioned. The revised SWMP has not been approved by DPHI during this audit period to reflect the recommendations outlined from the Initial Construction Audit. Transgrid have outlined the management of spoil will be publicly reported through their published Annual Review which would be made available on the Project website.
B16 (b) i)	Baseline surface water flow monitoring is recommended to demonstrate compliance with both condition B15 and B16.	Not yet actioned. The revised SWMP has not been approved by DPHI during this audit period to reflect the recommendations outlined from the Initial Construction Audit. The Project is intending to seek approval to update the SWMP in the next audit period.
B16	It is recommended that the existing TARPs be updated or new TARPS prepared to cover general pollution incidents and discharge of sediment laden water and that these be appended to the SWMP.	Not yet actioned. The revised SWMP has not been approved by DPHI during this audit period to reflect the recommendations outlined from the previous Construction Audit. The Project is intending to seek approval to update the SWMP in the next audit period.
	It is recommended the requirements for enhanced erosion controls and examples of what these entail should be documented within project TARPS; regular toolbox talks and site training as appropriate to ensure all staff are aware of the requirements for enhanced erosion and sediment controls for the project.	Not yet actioned. The revised SWMP has not been approved by DPHI during this audit period to reflect the recommendations outlined from the previous Construction Audit. The Project is intending seek approval to update the SWMP in the next audit period.
B16 (b) ii)	It is recommended given that two years of baseline surface water quality monitoring data is now available it is recommended that the WQMP be updated to incorporate site specific water quality monitoring trigger values.	Not yet actioned. The revised SWMP has not been approved by DPHI during this audit period to reflect the recommendations outlined from the Initial Construction Audit. The Project is intending to seek approval to update the SWMP in the next audit period.
B18 (b)	It is recommended for completeness the BOP be revised to include additional details of how the cost for each specific biodiversity offset measure was calculated.	Not yet actioned. Consistent with the previous Construction Audit consultation for the revision of the BOP with Snowy Hydro is still ongoing.

Condition / Issue	Previous Construction Audit - Recommendations	Transgrid Status Update
B21	It is recommended partial clearing monitoring is completed and a Verification Report Is prepared for Agency review so that any changes required to the construction vegetation clearing protocols can be identified and implemented during partial clearing works.	In progress. Transgrid anticipate the final VI monitoring survey to be completed mid-March 2025 followed by preparation of a detailed partial clearing verification report which will be submitted to NSW DPHI, RD, NPWS, FCNSW and AG DCCEEW.
	It is recommended Transgrid consult with BCS to update the BMP, ensuring the inclusion of timelines for verification reporting and the approach to updating clearing protocols as might be required regarding the outcomes of partial clearing monitoring.	Not yet actioned. The revised BMP has not been approved by DPHI during this audit period to reflect the recommendations outlined from the previous Construction Audit. The Project is intending to seek approval to update the BMP in the next audit period.
	It is recommended weed monitoring and management is undertaken in accordance with BMP MON14 and completed prior to completing clearing works.	Weed control activities were undertaken on Project West between 16th to 17th December 2024, and further activities conducted the 10th to 13th March 2025. UGL will continue to liaise with Active Trees to determine weed control schedule based on observations during their operations and knowledge of the weed growth rates.

Condition / Issue	Previous Construction Audit - Recommendations	Transgrid Status Update
	A number of measures to improve the management of partial clearing which should be investigated as part of the verification report include: • Development of a rapid methodology for monitoring partial clearing areas post clearing to ensure that partial clearing requirements have been followed and improvements can be identified early and implemented quickly. • Completion of rapid monitoring of partial clearing areas within three months of clearing for individual clearing permit areas. • Development and implementation of a medium to long-term monitoring methodology for partial clearing to determine whether the BDAR vegetation integrity predictions are being met, for integration with post construction site rehabilitation initiatives. • Assessment of locations and depth of mulch deposited in the partial clearing zones and determination of any positive or negative impacts related to vegetation retention and regeneration. • Consideration of whether any restrictions or amendments to mulch spreading rates or locations are required to improve or support vegetation regeneration outcomes. • Consider practicable initiatives for reduction of machine movements in partial clearing zones, such as locating stockpiles of logs for export in more appropriate areas such as total clearing zones. • Description of the successful methods which are currently being implemented to ensure partial clearing works are successful, such as retention of tree stumps. The description of existing successful methods is considered important to ensure a consistent approach is maintained throughout the partial clearing program.	Not yet actioned (it is noted that clearing works are now largely complete). The revised BMP has not been approved by DPHI during this audit period to reflect the recommendations outlined from the previous Construction Audit. The Project is intending to seek approval to update the BMP in the next audit period.
B24	It is recommended Transgrid continue to provide consolidated project updates and updated Aboriginal site mapping to RAPs.	Consolidated project updates and updated Aboriginal site mapping reviewed with RAPs during provision of RAP supervision services. Further discussions held with Brungle-Tumut LALC by UGL on 19th August 2024.
	It is recommended Transgrid continue to invite RAPs/identified knowledge holders to provide feedback on the distribution of sites and cultural understanding.	Distribution of sites and cultural understanding discussed with RAPs during provision of RAP supervision services. Further discussions held with Brungle-Tumut LALC by UGL on 19th August 2024.

Condition / Issue	Previous Construction Audit - Recommendations	Transgrid Status Update
	It is recommended Transgrid continue to invite to RAPs/identified knowledge holders to comment on the effectiveness of Aboriginal site/object management protocols.	RAPs/identified knowledge holders have been consistently engaged to comment on the effectiveness of Aboriginal site/object management protocols during provision of RAP supervision services. Further discussions held with Brungle-Tumut LALC by UGL on 19th August 2024.
B32 (d) i)	It is recommended that within the Traffic & Transport Management Plan that Appendix C Fatigue Management procedure is revised to reflect Project and remove references to rail.	The TTMP has been revised to remove all references to rail from Appendix C Fatigue Management procedure. The revised TTMP is pending approval from the Planning Secretary as part of the proposed TTMP for Stage 2 Works.
B32 (d) i)	It is recommended that within the Traffic & Transport Management Plan that Appendix D Snow and Ice Traffic Management Plan is revised to include details of flooding.	The TTMP has been revised to include details of flooding in Appendix D Snow and Ice Traffic Management Plan. The revised TTMP is pending approval from the Planning Secretary as part of the proposed TTMP for Stage 2 Works.
B32 (d) i)	It is recommended the Traffic & Transport Management Plan be revised to include details of employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers	The TTMP has been revised to include details of employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers. The revised TTMP is pending approval from the Planning Secretary as part of the proposed TTMP for Stage 2 Works.
B36 (c) i) / ii)	It is recommended the Visual Impact Management Plan be revised to include detailed plans for minimising visual impacts of the Maragle substation and transmission line easement.	The Visual Impact Management Plan has been revised to include detailed plans for minimising visual impacts of the Maragle substation and transmission line easement. The revised Visual Impact Management Plan was approved by the Secretary on the 25 October 2024.
B41	It is recommended UGL ensure all water tanks are filled with water prior the dedicated bushfire danger season.	Transgrid confirms all water tanks inclusive of the water supply tank located at the UGL Lobs Hole Compound are filled with water and a minimum 20,000L supply is maintained at each construction compound.
	It is recommended the water tanks across all Project sites be signposted in the case of an emergency firefighting services can easily locate the water supply.	Fire Fighting Water Tank signage was installed on the 26 November 2024.
B46	It is recommended moving forward Transgrid seek to attain waste dockets from JR Richards and Bellettes.	UGL is currently in the process of onboarding JJ Richards, who will take over waste disposal for Project West for Belletes. Christies will continue to undertake septic removal for Project West.
C1 (d) v)	It is recommended Section 3.7 of the EMS is revised to clearly set out the procedures on how to respond in the event of an emergency.	The EMS has been revised to clearly set out the procedures on how to respond in the event of an emergency. The revised EMS is pending approval from DPHI
C1 (e) ii)	It is recommended the EMS be revised to include clear plan or table depicting all the monitoring to be carried out in relation to the Project.	The EMS has been revised to include a clear plan or table depicting all monitoring to be carried out in relation to the Project. The revised EMS is pending approval from the Planning Secretary.

Condition / Issue	Previous Construction Audit - Recommendations	Transgrid Status Update
C2	It is recommended a document review register is created to track and keep records of all of the reviews that are triggered by Condition C2, including where a plan has been reviewed but the outcomes of that review identified no revisions were required.	A document review register has been created and aims to keep track and records of all of the reviews
EPBC Conditions 2018/8363		
Part B 25	It is recommended relevant plans including the BMP and EMS are updated to include specifics on what plans are required to report on non-compliances and incident to AG DCCEEW as outlined by AG DCCEEW correspondence dated 4 October 2024.	The revised BMP has not been approved by DPHI during this audit period to reflect the recommendations outlined from the previous Construction Audit. The Project is intending to seek approval to update the BMP in the next audit period.
Amendment Report Commitments		
B1	It is recommended that Transgrid provide additional information to support the Consistency Assessment. This should include clear and accurate PCT and species polygon mapping and impact totals for all additional impact areas not assessed in the BDAR and clear demonstration that any additional impacts do not exceed the approval conditions.	The Consistency Assessment was finalised on the 06 February 2025.
W10	It is recommended that the environmental inspection weekly checklist and the pre- and post- rainfall inspection checklists are updated to include a compliance measure relating to the conditions and controls installed around waterway crossings and access tracks to prompt staff completing these inspections to check all tracks and crossings remain in good condition.	The environmental inspection weekly checklist and the pre- and post- rainfall inspection checklists has not been updated and is intended to be included in the next updated of the SWMP. The Project is intending to seek approval to update the BMP in the next audit period.
HAZ4	It is recommended the Ocon Refuelling Procedure is revised to include a minimum of 40 metres clearance is required between fuel/chemical storage points and woody vegetation.	Completed. The refuelling procedures was updated on 16th August 2024 to include the following wording: The refuelling area will be located 100m away from any waterways and 40m from woody vegetation.

4.0 Compliance Assessment

This section provides a discussion of the identified non-compliances and the status of the approval documentation assessed as part of the audit. **Appendix 4** provides a condition-by-condition checklist of the Infrastructure Approval and EPBC Approval and identified compliance status of each condition. **Appendix 4** also includes a review against the BMP Biodiversity Mitigation Measures and Summary of Mitigation Measures committed to in the Projects Amendment Report (Transgrid, 2023).

The scope of approvals assessed as part of this audit is detailed in **Section 1.2**. Recommendations and opportunities for improvement arising from the compliance review and identified non-compliances are included **Section 6.0**.

4.1 Infrastructure Approval for SSI 9717 – MOD 1

The Project commenced construction on 4 December 2023 and for the duration of the audit period has been progressing construction activities. Construction activities during this audit period has been primarily associated with the construction of the Maragle Switchyard, pre-clearance monitoring, partial and total clearance activities and civil works along tracks. There were nine (09) non-compliances identified against the infrastructure approval. A summary of the identified non-compliances are provided in Table 4.1 with further details provided in the compliance tables in **Appendix 4**.

Table 4.1 Non-Compliance with SSI 9717 – MOD 1

Condition	Non-Compliance
A2	**NC-01:** Non-Compliances against conditions have been identified during the audit period and are recorded in this table and in the main Audit Report.
B10	**NC-02:** Enhanced erosion and sediment controls were not observed on the eastern side of the Project alignment around Track 4 and Track 5. Controls were inconsistent and did not align with the Projects Progressive Erosion and Sediment Control Plan.
B11	**NC-03:** During the audit period six incidents were reported involving the discharge of turbid water.
B21	**NC-04:** This audit has identified a number of Non-compliances with the BMP as detailed in of this report and further in **Appendix 4**.
B29	**NC-05:** The dilapidation surveys have not been undertaken 6 monthly as required in the Road Maintenance Agreement with SVC.
B32	**NC-06:** There is no verifiable evidence to show monthly inspections of transport routes and traffic monitoring was undertaken during the audit period.
B46	**NC-07:** Transgrid have been unable to obtain waste dockets to verify the disposal locations of waste.
C4	**NC-08:** There is no verifiable evidence to support that the Department were notified that Stage 2 works have commenced.
C11	**NC-09:** The Additional Easement Strategy has not been uploaded to the Project Website.

4.1.1 Compliance Performance Summary

In summary it is considered that Transgrid have demonstrated a reasonable level of compliance against SSI 9717 – MOD 1 during the audit period with 85.7% of the compliance requirements under SSI 9717 – MOD 1 being met (note items identified in **Appendix 4** as not triggered are not included in this assessment summary).

The systems and processes that have been put in place are largely considered appropriate to manage compliance and are considered to have been implemented well, however this audit has identified a number of recommended actions that are provided to address the non-compliances and improve environmental management and performance. The majority of the non-compliances identified are not deemed to have resulted in material environmental harm. However, non-compliances associated with Condition B21 (Biodiversity Management) particularly those relating to partial clearing practices and the use of inappropriate vegetation clearing methods are considered to have the potential to have resulted in environmental harm (as defined under the Infrastructure Approval). It is considered that the extent of the impacts will require remedial actions to address.

It is considered that if the actions proposed in **Section 5.0** are adopted then there is no reason the Project cannot demonstrate full compliance.

4.2 EPBC Approval

During the audit period construction activities undertaken have been conducted under EPBC 2018/8363. The EPBC Approval as issued under the *Environment Protection and Biodiversity Conservation Act 1999* outline Transgrid's responsibilities and the environmental performance standards it is required to meet.

The Project reports its performance against the above responsibilities and environmental performance status via the submission of its Annual Compliance Report. Generally, the Project has demonstrated compliance with the conditions of its EPBC, however, some non-compliances have been identified. The non-compliances identified with EPBC 2018/8363 are detailed in Table 4.2 below with further detail provided in **Appendix 4.**

Table 4.2 Non-Compliance with EPBC 2018/8363

Condition	Non-compliance
3	**NC- 10:** Non-Compliance was triggered in relation to not all management measures were implemented as per the requirements of the BMP in particular partial clearing. Refer to Condition B21 in Table 4.1 for further detail.
6	**NC- 11:** Non-Compliance was triggered in relation to not all management measures were implemented as per the requirements of the BMP in particular partial clearing. Refer to Condition B21 in Table 4.1 for further detail.

4.3 Amendment Report Mitigation Measures

Generally, the Project has demonstrated compliance with the mitigation measures of its amendment report, however, one non-compliance was identified. The non-compliance identified with amendment report is detailed in below with further detail provided in Table 4.3**.**

Table 4.3 Non-Compliance with Amendment Report Mitigation Measures

Mitigation Measure	Non-compliance
B5	**NC-12:** The audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in **Appendix 4.**
B11	**NC-13:** The audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in **Appendix 4.**
B17	**NC-14:** The audit has identified a number of Non-compliances with the BMP as detailed in Table 4.5 of this report and further in **Appendix 4.**
W3	**NC-15:** During the site inspection erosion and sediment controls were observed to be inconsistent and did not align with the Projects Progressive Erosion and Sediment Control Plan on the eastern side of the project around Track 4 and Track 5.
T4	**NC-16:** No verifiable evidence could be provided to show any updates to the dilapidation report were undertaken during the audit period.

4.4 Environmental Management Plans

Transgrid and UGL have developed a number of Environmental Management Plans and post approvals compliance documentation for the Project in accordance with relevant requirements of the Infrastructure Approval. These documents address specific impacts associated with the Project, such as heritage, biodiversity and sediment and erosion control, and reflect the requirements detailed in the Infrastructure Approval.

An overview of the compliance status of the Environmental Management Plans and post approvals documentation, including an overview of the compliance with the requirements of the Infrastructure Approval and implementation status of the plans, is included in Table 4.4 with further details provided in **Appendix 4**. Recommendations and opportunities for improvement, as relevant, are included in **Section 5.0**.

Table 4.4 Environmental Management Plans

Condition	Management Plan	Status of Plan
B3	**Out-of-Hours Work Protocol** (OOHWP)	An OOHWP has been prepared and approved for the Project as confirmed during the Initial Construction Audit. The OOHWP was revised during Construction Audit 2. The OOHWP was not revised during this audit period.
B8	**Spoil Management Plan**	A Spoil Management Plan has been prepared and approved for the Project as confirmed during the Initial Construction Audit. The Spoil Management Plan has been combined with the SMWP. During this audit period, the Spoil Management Plan has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the Spoil Management Plan was not required to be submitted for consultation as updates were minor in nature. In Construction Audit 2 it was noted the Spoil Management Plan was undergoing consultation regarding updates in relation to recommendations outlined in previous Construction Audits. Transgrid has advised consultation is still ongoing and this would be subject to a subsequent approval (refer to **Appendix 4** for further details of compliance review).

Condition	Management Plan	Status of Plan
B16	**Soil and Water Management Plan** (SWMP)	The Water Management Plan referred to as the SWMP as confirmed during the Initial Construction Audit has been prepared for the Project and approved by the Planning Secretary. During this audit period, the SWMP has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the SWMP was not required to be submitted for consultation as updates were minor in nature. In Construction Audit 2 it was noted the SWMP was undergoing consultation regarding updates in relation to recommendations outlined in previous Construction Audits. Transgrid has advised consultation is still ongoing and this would be subject to a subsequent approval (refer to **Appendix 4** for further details of compliance review).
B18	**Biodiversity Offset Package** (BOP)	The BOP has been prepared for the Project as confirmed during the Initial Construction Audit (refer to **Appendix 4** for further details of compliance review). It is noted consultation with Snowy Hydro has carried from Construction Audit 2 into this audit period. Consultation is regarding the revision of the BOP to align the strategy with the recommendations outlined in the Initial Construction Audit. At the conclusion of the audit the BOP was still subject to ongoing consultation with Snowy Hydro.
B21	**Biodiversity Management Plan** (BMP)	A BMP has been prepared and approved for the Project as confirmed during the Initial Construction Audit. During this audit period, the BMP has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the BMP was not required to be submitted for consultation as updates were minor in nature. It should be noted changes to the BMP to reflect recommendations in previous audits is still subject to ongoing consultation and subsequent DPHI approval (refer to **Appendix 4** for further details of compliance review). A detailed review and compliance assessment against the BMP biodiversity management measures has also been completed and is also provided in **Appendix 4** with a summary of the non-compliances identified included in **Section 4.4.1**.
B24	**Heritage Management Plan** (HMP)	A HMP has been prepared and approved for the Project as confirmed during the Initial Construction Audit. During this audit period, the HMP has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the HMP was not required to be submitted for consultation as updates were minor in nature (refer to **Appendix 4** for further details of compliance review).
B27	**Transport Strategy**	A staged Transport Strategy has been approved for the Project as confirmed during the Initial Construction Audit. A review of the Transport Strategy Stage 1 against the requirements of SSI 9717 – MOD 1 has confirmed that it contains the required information as per the conditions of the approval (refer to **Appendix 4** for further details of compliance review). The Transport Strategy Stage 2 is being drafted and awaiting approval at the time of the audit.

Condition	Management Plan	Status of Plan
B32	**Traffic and Transport Management Plan** (TTMP)	A TTMP has been approved for the Project as confirmed during the Initial Construction Audit. The approved TTMP is to be prepared in two stages. A review of the Transport Strategy Stage 1 against the requirements of SSI 9717 – MOD 1 has confirmed that it contains the required information as per the conditions of the approval (refer to **Appendix 4** for further details of compliance review). The TTMP for Stage 2 Works is being drafted and awaiting approval at the time of the audit.
B33	**Long-Term Road Strategy**	The Long-Term Road Strategy was not required to be prepared at the time of the audit. The Long-Term Road Strategy is required to be prepared within 2 years following commencement of construction.
B36	**Visual Impact Management Plan**	A Visual Impact Management Plan has been prepared and approved for the Project as confirmed during the Initial Construction Audit. A review of the Visual Impact Management Plan has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to **Appendix 4** for further details of compliance review). The Visual Impact Management Plan has not been revised during the audit period
B38	**Additional Easement Rehabilitation Strategy** (11 kv Line Rehabilitation Strategy)	A 11 kv Line Rehabilitation Strategy has been prepared to the satisfaction of NPWS within six months from the commencement of construction as confirmed during the Second Construction Audit. A review of the 11 kv Line Rehabilitation Strategy confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1. The 11 kv Line Rehabilitation Strategy has not been revised during the audit period.
B42	**Emergency Plan**	An Emergency Plan been prepared and approved for the Project as confirmed during the Initial Construction Audit. A review of the revised Emergency Plan has confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to **Appendix 4** for further details of compliance review). The Emergency Plan has not been revised during the audit period
B48	**Rehabilitation Management Plan** (RMP)	An extension was sought during this audit period to extend the submission date of the RMP extending the submission date to the 04 April 2025. The RMP was submitted to the Planning Secretary for approval on the 03 February 2025. At the time of the audit the RMP was still pending approval.
C1	**Environmental Management Strategy** (EMS)	An EMS has been prepared and approved for the Project as confirmed during the Initial Construction Audit. The EMS was reviewed and was confirmed that it contains the required information as per the requirements of SSI 9717 – MOD 1 (refer to **Appendix 4** for further details of compliance review). During this audit period, the EMS has been updated to reflect Stage 2 Works.

4.4.1 BMP Biodiversity Management Measures

The non-compliances identified with the BMP Management Measures are detailed in below with further detail provided in Table 4.5**.**

Table 4.5 Non-Compliance with BMP Management Measures

Management Measure	Non-compliance
BMP4	During the site audit inspection the retention of managed shrub and groundcover vegetation was observed to be compromised due to extensive application of woodchip mulch, specifically across Project Area West Project West between the Switch yard and Track 1 over approximately 1.5km area of the easement. The initial use of the forestry mulcher within the Project West area did not comply with the BMP's requirement to use an excavator mulcher. A forestry mulcher is not considered a similar machine.
BMP9	During the audit period four rainfall events occurred that resulted in potential impacts to Booroolong Frog habitat due to sediment-laden water discharges.
BMP11	Clearing along Track 5C was observed beyond the installed red ropes and pegs which delineated the clearing limits. This non- compliance is due to the established BMP boundary controls not being properly followed. During the site audit inspection blue ropes were observed to be incorrectly used to delineate clearing limits (blue ropes are used for demarcation of Heritage Sites) which is also not compliant with the procedures set in the BMP.
BMP12	Refer to BMP11.
BMP16	During review of documentation, it became evident clearing on Track 5 was not fully compliant with the BMP Clearing Protocol requirements for staged clearing where habitat-bearing trees are identified.
BMP22	Refer to BMP16.
BMP23	Refer to BMP16.
BMP46	Additional *Caladenia montana* plants were identified during the audit period but were located outside of the species polygon areas assessed in the final BDAR. It is considered that the location of additional plants outside of the 30 metre buffer areas, assessed in the final BDAR, should be considered as being unexpectedly encountered. Unexpected finds protocol should be followed.
BMP 47	During the site inspection active weed spraying was observed on Track 6. Contractors were observed broadly applying Grazon Extra herbicide on black berry using a vehicle-mounted, motorised pump and hose. The broad-scale application of Grazon Extra presents a risk to retained shrubs and broad-leaved native species and is not considered appropriate for use in partial clearing zones, where selective vegetation retention is required.
BMP51	During the site audit inspection erosion and sediment controls were observed to be inconsistent and did not align with the Projects Progressive Erosion and Sediment Control Plan in the western portion of the Project.

5.0 Environmental Performance

5.1 Management Commitment and Resourcing

Throughout the audit, Transgrid and UGL staff were co-operative and forthcoming with information and this allowed the audit team to gain an understanding of the culture of the organisation and project team working on the Project. It was noted during the audit that the Project staff had good record keeping in relation to environmental approvals and compliance. Regarding resourcing for environmental personnel, Jason Snape, Senior Environmental Advisor from Transgrid is responsible for overall compliance associated with the delivery of the Project and coordinates regularly with UGL personnel. Jason is then supported by Chris Wool and Chris Johnson who are Transgrid's Environmental Advisors for the Project.

Brendan Toohey is the Environment Manager for UGL and is supported by a team of environmental professionals that is spread across the Project alignment which is split into two distinct Project areas including Lobbs Hole (Project East) and Maragle (Project West). Brendan is supported by Camille Palmer, Senior Environmental Advisor, on both the eastern and western alignments. On the eastern alignment, he is also supported by Lauren Logue, Environmental Advisor, and on the western alignment by Vivian Lee Yu, Environmental Advisor.

To meet the commitments outlined by the Infrastructure Approval third party environmental contractors are also used to support the environment team as needed. In respect to this audit period the Project has continued to engage LENECO and SLR Consulting to assist in fulfilling biodiversity monitoring and management requirements. In total approximately 80 ecologists have been engaged and are rostered on a rotating schedule. Furthermore, Navin Heritage Consultants have also been engaged to support in providing assistance for Aboriginal Cultural Heritage management.

Given the scale and complexity of the Project, interface meetings with neighbouring Projects are conducted weekly. Participants include representatives from Snowy Hydro, Transgrid, Future Generation Joint Venture, and UGL. The purpose of these meetings is to provide all stakeholders with insight into work scope activities, facilitate the development of optimal solutions, and prevent work stoppages for all involved parties.

5.2 Compliance Management

Transgrid alongside UGL utilise compliance tracking systems to ensure they meet the specific performance measures and criteria set out by this approval. The compliance trackers that have been developed for the Project outline responsible parties, evidence of compliance and associated comments from Transgrid or UGL and relevant links to associated files.

Additionally, Transgrid manages a Notification Tracker for regulators and stakeholders related to the relevant approvals and agreements. Alongside this Notification Tracker, a Management Plan Tracker is also maintained to monitor updates and revisions of management plans required by the Infrastructure Approval while tracking all stakeholder consultations. This workbook has been updated during this audit period in response to previous audit recommendations, to ensure the workbook is able to track revisions even when no updates are required.

It was evident during the audit that Transgrid and UGL communicate and operate concurrently. To track these communications across teams, they continue to utilise a software called TeamBinder. This platform centralises all documentation and streamlines the review and approval process for controlled documents.

Consistent with the previous construction audit, when documents are uploaded into the system, TeamBinder automatically distributes them to the relevant users via email notifications with all transactions and revisions are recorded within the system. Correspondence is also auto numbered, filed and maintained securely throughout the Project. Any outstanding communications can be identified and accessed in real time.

5.3 Reportable Environmental Incidents and Complaints

The reportable environmental incidents, Penalty Infringement Notices and regulatory orders that occurred during the audit period are discussed in the following sections. It is noted that during the audit period there were zero community complaints received.

5.3.1 Penalty Infringement Notices / Orders

No penalty infringement notices were received during this audit period.

5.3.2 Reportable Incidents

The reportable environmental incidents which have occurred during the audit period as advised by Transgrid are detailed below with further details provided in **Appendix 4**. Upon review it is considered that Transgrid and UGL have appropriately followed the required incident reporting processes as required under SSI 9717.

- On the 18 October 2024, approximately 45.4 mm of rainfall was recorded over the Project Area (East). At approximately 4:00 pm, a short-duration, high-intensity rainfall event (9.6 mm over 15 minutes) exceeded the capacity of erosion and sediment controls along Track 8, resulting in turbid water entering the roadside drain on Mine Trail Road and flowing towards Wallaces Creek. Water quality sampling was undertaken upstream and downstream of the landslip, as well as at the EPL reference and impact sites on Wallaces Creek. Results indicated comparable turbidity levels, suggesting no significant impact on water quality. Notification was provided to the Department, NPWS, CPHR, EPA and AG DCCEEW on 19 October 2024, with a detailed incident report submitted on 24 October 2024.

- Between 27–29 November 2024, approximately 80.8 mm of rainfall was recorded in Project Area (East) during a 120-hour, 90th percentile rainfall event. Inspections conducted from 28 November to 1 December identified turbid water discharges from Track 5 to Sheep Station Creek and from Track 8 to Cave Gully and the Yarrangobilly River. Water quality sampling confirmed elevated turbidity levels. An initial notification was issued on 28 November 2024to the Department, NPWS, CPHR, EPA, and AG DCCEEW, with follow-up notifications issued the same day and again on 1 December to reflect additional discharge observations and confirm the duration of the rainfall event. A detailed incident report was submitted on 5 December 2024.

- Between 5–7 December 2024, approximately 85.4 mm of rainfall was recorded in the Project Area (East) during a 120-hour, 90th percentile event. Inspections identified turbid water discharges from Track 5 to Sheep Station Creek and from Track 8 to Cave Gully and the Yarrangobilly River. Water

quality sampling confirmed elevated turbidity. An initial notification was issued on 6 December to the Department, NPWS, CPHR, EPA and AG DCCEEW with a revised notification sent on the 8 December 2024 to reflect additional discharges observed on 7 December. A detailed report was submitted on 13 December 2024.

- Between 6–7 December 2024, approximately 55.6 mm of rainfall was recorded in the Project Area (West). Post-rainfall inspections on 8 December identified turbid water discharges from Track 2 and Tower Pad 1R/2R-12 beyond the development boundary. No water sampling was undertaken. The incident was reported to the Department, NPWS, CPHR, EPA and AG DCCEEW on 8 December 2024, with a detailed report provided on 14 December 2024.

- On 11 January 2025, approximately 11.2 mm of rainfall was recorded in the Project Area (East). Inspections identified turbid water discharging from Track 8 towards Wallaces Creek. Water quality sampling undertaken at Sheep Station Creek, Cave Gully, and the Yarrangobilly River indicated elevated turbidity levels. An initial notification was issued on 11 January 2025 to the Department, NPWS, CPHR, EPA and AG DCCEEW, with a detailed report submitted on 17 January 2025.

- On 15 January 2025, a severe storm event impacted the Project Area (West), delivering approximately 26.2 mm of rainfall over 30 minutes, with peak intensity reaching 228.6 mm/hour and wind gusts exceeding 100 km/h. Inspections identified turbid water discharge from a “V” drain adjacent to the Maragle Switchyard, flowing towards New Zealand Gully. Water sampling confirmed elevated turbidity levels. Notification was issued on 16 January 2025 to the Department, NPWS, CPHR, EPA and AG DCCEEW, with a detailed report submitted on 17 January 2025.

5.4 Biodiversity Management

5.4.1 Overview

As required and endorsed by DPHI, Jacob Manners, Principal Ecologist and Accredited BAM Assessor undertook the auditing of the Project Biodiversity Management requirements and obligations.

The key focus of biodiversity management for the Project is to ensure that all avoidance, mitigation and management measures relevant to biodiversity and referred to in the environmental assessment documents and relevant permits and approvals are addressed.

5.4.2 Summary and Response to CPHR Engagement

During the auditors consultation process with regulatory agencies for Construction Audit 3, CPHR raised concerns regarding some of the recommendations made in Construction Audit 2, particularly those relating to the verification of partial clearing works and associated monitoring methodologies. These concerns were discussed further with CPHR representatives in a meeting between Umwelt’s Lead Auditor (Daniel Sullivan) and Biodiversity Auditor (Jacob Manners) and are further acknowledged and responded to below.

At the time of Construction Audit 2, CPHR acknowledges the verification report for partial clearing works has not been completed by Transgrid and noted that delays in the BAM-Calculator process contributed to this, but efforts to address the issue only began in December 2024 (nine months after clearing started in March 2024). CPHR reiterate that although vegetation integrity (VI) monitoring is useful, it is not required

by the BMP or the Infrastructure Approval. Therefore, the delay in completing the verification report should not be attributed to VI monitoring issues.

Umwelt agree and reconfirm that Construction Audit 2 identified this as a non-compliance for not completing the verification report. Further it in response it is noted that while the Infrastructure Approval conditions only require one verification report, based on monitoring within three months of construction commencement, there is no restriction on providing additional reports. For example, verification reporting could have been undertaken both during the clearing process and at its commencement. It is the audit teams view that such reporting during the site clearing phase would have been valuable in confirming the correct implementation of clearing protocols and in documenting any necessary corrective actions. This approach aligns with the intent of Condition B21(c)(viii) of the Infrastructure Approval.

Verification reports could also have included observations beyond VI monitoring. These could include details on the type of machinery used and the comparative results achieved, the depth of woodchip left on site following clearing, the location and management of stockpiles, and observations of any disturbance to retained vegetation and soil caused by compaction, trampling, or movement of machinery.

CPHR also raised concerns, questioning the recommendation to develop a rapid methodology for monitoring partial impacts, arguing that BAM must be used to determine VI scores to ensure consistency with the Biodiversity Development Assessment Report. CPHR outlined that if the verification report been completed within three months of construction commencement as required by Condition B21(c)(viii), it could have identified whether partial clearing protocols were followed and enabled early improvements during the clearing process.

In response Umwelt confirmed that this recommendation was made in addition to the requirements in the approval and BMP, noting that a rapid monitoring and reporting approach would have enhanced the ability of the supervising ecologist to identify issues during clearing, rather than post-completion. This would have allowed for real-time corrective actions rather than >3 months post clearing or through remedial measures after the completion of clearing thus providing a more effective resolution of emerging issues. As the ECZ clearing is now complete, this opportunity has largely been missed, and any corrective measures are likely to be retrospective and more resource intensive.

CHPR also questioned the recommendation regarding the development and implementation of a medium-to long-term monitoring methodology for assessing partial clearing outcomes against the BDAR. While CHPR acknowledged the value in assessing whether BDAR-predicted vegetation integrity outcomes are being achieved, they noted that those predictions were based solely on construction-phase impacts and do not incorporate expected post-construction regeneration or rehabilitation.

However, it should be noted the BMP (Action ID BIO 9, Table 2.2) requires post-clearing monitoring of vegetation integrity, with a particular focus on vegetation management within the ECZ and Habitat Tree Zones (HTZ), and with the aim of maintaining long-term vegetation integrity targets. The BMP recognises that all vegetation strata may experience some impacts due to the forested nature of the Project Area, but also expects rapid natural regeneration. Heavily impacted areas are to be rehabilitated in line with the Rehabilitation Management Plan which is currently subject to Department review and approval.

Furthermore, as an outcome of this audit (Construction Audit 3) it is recommended that the ECZ west of Track 1 on Maragle West and other areas where vegetation integrity targets cannot be achieved due to

factors such as a deep cover of woodchip be identified as heavily impacted and subject to rehabilitation under the Rehabilitation Management Plan.

The Infrastructure Approval, BMP, and BDAR do not require VI predictions to be met immediately after clearing. Nor do they define the content requirements for VI monitoring in verification reports. Rather, Condition B21(c)(viii) focuses on assessing the suitability of clearing methods. An Operational Vegetation Management Plan outlining long-term VI monitoring requirements must also be prepared and implemented prior to the operational phase (as required by BMP Action BIO 9). The BDAR also assumes "Selective slashing and/or mulching with slasher/mulcher set to 200 mm above the ground level across the easement, particularly below the conductors or to establish safe access during maintenance" for the ECZ.

Lastly, CPHR requested further clarification on how the recommendation to describe "successful methods currently being implemented to ensure partial clearing works are successful" can be applied, given that a verification report has not yet been provided to confirm whether partial clearing works have met their predicted vegetation integrity scores. The recommendation to describe "successful partial clearing methods" was intended to capture lessons learned and ensure that effective practices are carried forward for the remainder of the project. It does not replace or negate the requirement for a verification report.

In summary, while CHPR's concerns regarding the recommendations are acknowledged, the implementation of more timely and adaptive monitoring and verification processes would have allowed for better oversight and continuous improvement during the clearing phase. It's important to note the intention of the recommendations was to improve future reporting efforts and was aimed to capture these learnings to support compliance with the Infrastructure Approval, and inform ongoing vegetation management.

5.4.3 Construction Audit 3 Findings

Evidence of the implementation of the BMP during this audit period was observed during the site audit inspection and a thorough review of documentation. Across the site, various measures aligned with the BMP were in place; however, some areas demonstrated inconsistent application, particularly in relation to partial clearing, fauna management, sediment controls, and documentation of pre-clearing protocols.

During the audit, clearing works within the eastern project alignment along Track 5C was observed to extend close to or potentially beyond the approved disturbance boundaries, with the audit inspection observing areas where clearing had occurred outside of installed pegs and red and blue ropes which were installed to demarcate the limit of clearing. UGL has since engaged a surveyor to verify the disturbance boundaries along Track 5C on the 13 March 2025, who confirmed that clearing remained within the approved disturbance boundary. While clearing did occur outside the delineated red and blue ropes that had been installed on site, UGL confirmed that in this instance these ropes were set with conservative buffers and that clearing occurred only within those buffers, not beyond the approved limits. Despite this, the methodology used was inconsistent with BMP 11, which requires all boundaries of clearing to be delineated using high-visibility fencing and clear signage. Additionally, the use of blue ropes in place of red ropes was identified as non-compliant with BMP 12, which requires properly marked Exclusion Zones to protect retained vegetation. Blue ropes, which are typically used to delineate heritage exclusion areas, were incorrectly used instead of red ropes, which are designated for clearing limit boundary, and these were also observed to have been cleared through (refer to **Plate 1, Plate 2, Plate 3** and **Plate 4** in **Appendix 5**).

Partial clearing, which is intended to minimise ecological disturbance by preserving ground cover and understorey vegetation, showed mixed implementation across the Project Area. In Project East, hand-cleared areas generally retained native ground cover and an appropriate density of shrubs, aligning with the intended outcomes of the BDAR and BMP (refer to **Plate 5, Plate 6** and **Plate 7** in **Appendix 5**).

Within the Easement Clearing Zone (ECZ) on the Project West between the Maragle Switch Yard and Track 1 over an area of approximately 1.5km of the easement, significant groundcover disturbance was observed (refer to **Plate 8**, **Plate 9, Plate 10, Plate 11, Plate 12, Plate 13, Plate 14, Plate 15, Plate 16, Plate 17** and **Plate 18** in **Appendix 5**). Specifically, the retention of managed shrub and groundcover vegetation appeared to be compromised due to the use of extensive application of woodchip mulch, particularly between the western extent of the Project Area, west from Track 1. This excessive generation and application of mulch is considered to be attributed to failure to adhere to the BMP clearing requirements, which required an excavator mulcher to be utilised for clearing of trees with a diameter under 200 mm. After the site inspection, a Post-clearing Vegetation Integrity Monitoring Report (LENECO April 2025) was provided. The report identified that from February to May 2024, clearing in the ECZ was undertaken using an excavator-mounted mulcher, with Transgrid noting that a forestry mulcher was also utilised for a period in March 2024 however after March was no longer used due to challenges with steeper/undulating terrain. As observed during the audit site inspection the use of these clearing methods has resulted in excessive woodchip mulch and increased ground disturbance, especially in the taller forest areas in Project Area West. The LENECO Report also identified this and mapped an area of approximately 1.5km between Maragle Switch Yard and Track 1 where mulch cover was confirmed to range from 76% to 100% (refer to **Figure 1**). The use of the forestry mulcher on the Project West site did not comply with the BMP's requirement to use a excavator mulcher. The forestry mulcher is not considered a similar machine to an excavator mulcher due to differences in design, mobility, and application. Forestry mulchers are self-propelled, purpose-built machines designed primarily for clearing on-ground vegetation, shrubs, and small trees over large areas, whereas excavator mulchers are attachments fitted to excavators, offering greater flexibility for selective clearing, especially in partial clearing zones.

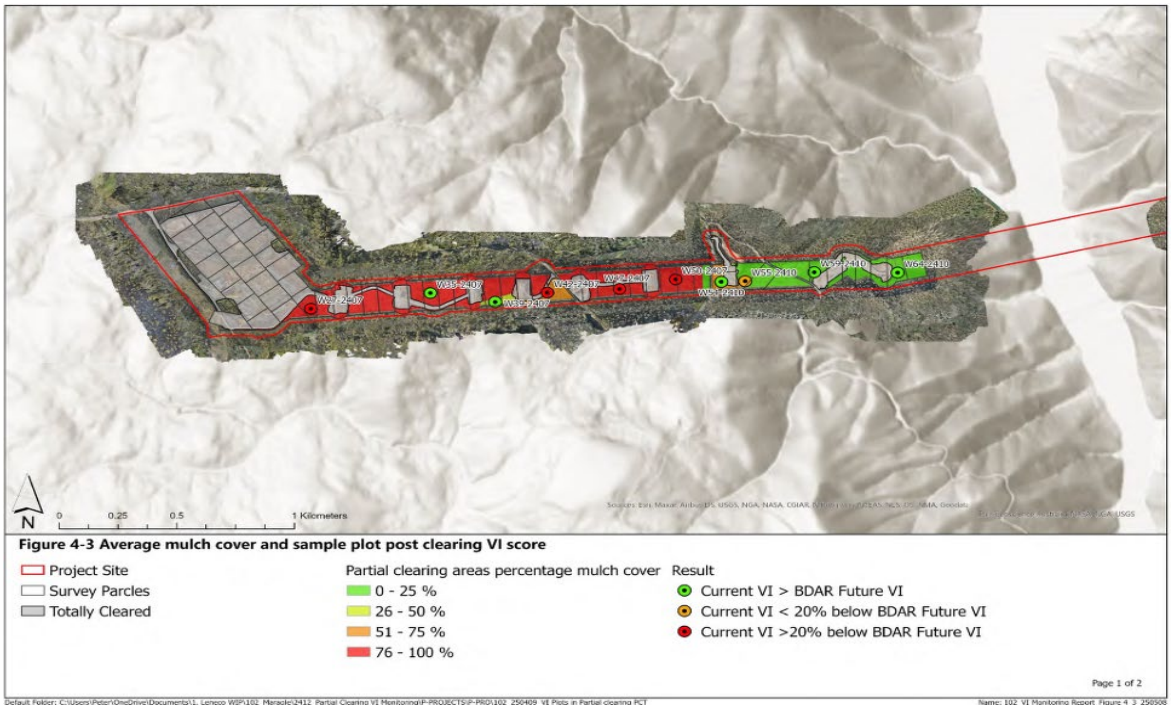


Figure 1 **Average mulch cover and sample plot post clearing VI score (LENECO, 2025)**

This non-compliance has likely led to increased disturbance and impacts to shrubs and ground cover vegetation and resulted in excessive woodchip cover that has smothered shrub and groundcover vegetation that was required to be retained. Furthermore, the application of mulch at such depth has likely elevated ground temperatures, potentially degrading the soil seedbank. It is important to note that spreading mulch is not considered a form of rehabilitation and, in this case, may have had the opposite effect by impeding vegetation recovery. The extent of the impacts observed from this have the potential to have resulted in environmental harm (as defined under the Infrastructure Approval).

The Post-clearing Vegetation Integrity Monitoring Report was finalised outside of the current audit period and therefore will be subject to a further detailed review during the next audit.

A combination of unapproved clearing methods (i.e., use of a forestry mulcher instead of an excavator mulcher) and poor mulch management, has likely resulted in negative ecological outcomes (particularly in areas where partial clearing was required) and is inconsistent with the requirements and intent of the BMP.

Five fauna rescue incidents were reported during the audit period. These included the relocation of a spiny crayfish from clearing area E-08 on 8 February 2025 which was not formally identified. Given the potential for presence of two species of threatened spiny crayfish, the Spiny Alpine Crayfish (*Euastacus crassus*) and Murray Crayfish (*Euastacus armatus)* in the locality, further taxonomic clarification should have been sought. In response to these findings, Transgrid have since engaged SLR to identify the species. The crayfish has been identified as the North-Eastern Burrowing Crayfish (*Engaeus cymus*), which is not classified as a threatened species. On 9 February, two Brown Antechinus (*Antechinus stuartii*) and a Sugar Glider (*Petaurus breviceps*) were observed evacuating from hollow-bearing trees in E-07, while a microbat located in E-13 was managed in accordance with best-practice by temporarily stuffing the hollow to allow safe, nocturnal exit. A final rescue on 21 February involved another antechinus located within a hollow in E-05, which was similarly protected and released unharmed. Clearing on Track 5 was not fully compliant with the BMP Clearing Protocol requirements for staged clearing, as some habitat trees were removed during stage 1 due to steep ground conditions and critical construction works. The fauna records from this audit period confirm that fauna protocols were generally applied, though species identification and recording could be improved to support better biodiversity monitoring and staged clearing requirements should be complied with for all habitat trees, unless there are overriding WHS considerations.

It is considered that the detection of *Caladenia montana* during the audit period outside of locations assessed as part of the species polygon in the BDAR, should have been reported as an unexpected find. Further details of the extent of clearing of all habitat for this species should be further determined to ensure that the project remains within the 9.35 ha habitat clearing limits set in the project Infrastructure Approval for this species.

A Consistency Assessment was also reviewed for the Project, which identified an overall reduction in clearing, however increased clearing totals for PCT 999 (0.17 ha of additional clearing) and did not include an analysis of species polygons, including no assessment of the revised species polygon for *Caladenia montana*. Further consideration of species polygons is therefore required and consultation with DPHI, CPHR and NPWS is also required, any additional impacts to PCTs or species polygons should be discussed.

Pest species monitoring was conducted in accordance with the BMP during the audit period. The Quarter 4 Pest Monitoring Report highlighted a significant presence of feral horses across Project Area (West), consistent with field observations made during the site inspection. Deer were also detected at six locations.

In Project Area East, pest species detections, namely red foxes and deer were infrequent. These findings suggest that feral horse management remains a key biodiversity issue, particularly in the western portion of the Project Area.

Weed management activities were observed and reviewed during the audit. Herbicide application records were maintained in a register, with chemical use required to comply with approvals issued by the NPWS. During the site inspection, active spraying was observed along Track 6 using a vehicle-mounted hose. The application as observed was considered broad rather than targeted, reportedly treating known infestations of blackberry and regrowth of eucalyptus inhabiting the same area. This raises concerns about non-selective spraying impacting regenerating native vegetation. It was also observed in Project Area West that in areas where liberal application of mulch has occurred that weed species are starting to grow in the mulch. Targeted weed management is needed to ensure these areas do not become colonised by weed species. Timber stockpiles were observed across both Project East and Project West (refer to **Plate 10** in **Appendix 5**), with Transgrid advising that timber within the Kosciusko National Park cannot be removed.

Finally, sediment and erosion control measures intended to protect Booroolong Frog (*Litoria booroolongensis*) habitat (refer to **Plate 19** and **Plate 20** in **Appendix 5**). During the audit period, four significant rainfall events resulted in turbid water discharges into catchments that support this threatened species. These occurred on 18 October 2024, 28–30 November 2024, 5 December 2024, and 11 January 2025, with sediment-laden runoff discharged from Track 5 and Track 8 into receiving waterways. Monitoring was undertaken following all events in accordance with the Trigger Action Response Plan. Site inspections of known frog habitat near Track 8, including Wallaces Creek, revealed some protective measures such as rope barriers and signage; however, erosion controls were often poorly installed along the creek edge. Sediment fences, for example, were inadequately embedded, undermining their capacity to prevent runoff (refer to **Plate 21** in **Appendix 5**). However it was unclear during the audit if the Creek was within the development boundary or was within a joint management area. Nevertheless these deficiencies suggest a high risk of further degradation to sensitive frog habitat if control measures are not reinforced and better maintained moving forward.

5.5 Aboriginal Cultural Heritage Management

As required and endorsed by DPHI the auditing of the Projects Cultural Heritage Management requirements and obligations was undertaken by Luke Wolfe, Principal Archaeologist.

The key focus of the Aboriginal Cultural Heritage management for the Project is to ensure that harm is prevented to all Aboriginal cultural heritage (both tangible and intangible), and that Aboriginal objects are managed in accordance with the provisions of the Aboriginal Heritage Management Plan (AHMP).

During the audit, the Project Team presented outcomes of two (2) recent unexpected heritage find events identified during the audit period, including examples of summary reports and real-time spatial data. The management of all three unexpected finds incidents appeared to comply with the procedure outlined in Appendix B of the AHMP. Examples of reporting provided to the audit team prepared by the project heritage consultant appeared to be of a high standard and provided pertinent details to the management of the Aboriginal cultural heritage finds with evidence of all Aboriginal Site Impact Recording forms being submitted.

During the site inspection, the audit team raised questions regarding the consultation and reporting processes undertaken with Aboriginal stakeholders. It was noted that the AHMP identifies twenty-one

Registered Aboriginal Parties (RAPs). However, the Project Team advised that, to date, engagement has primarily been limited to the Brungle Tumut Local Aboriginal Land Council (LALC), and that the remaining listed RAPs had generally not been notified of clearance activities or incidents involving unexpected heritage finds.

While the audit team acknowledged that previous Aboriginal cultural heritage workshops had been held with representatives of the Brungle Tumut LALC yielding positive outcomes for both stakeholder relationships and the Project, it was recommended that future workshops broaden their focus. Specifically, workshops should further explore the cultural values associated with the unexpected finds identified to date and consider a reassessment of the archaeological model to ensure the continued adequacy and relevance of procedures outlined in the AHMP.

5.6 Erosion and Sediment Control and Water Management

As required and endorsed by DPHI the auditing of the Project's Erosion and Sediment Control and Water Management requirements and obligations was undertaken by Melissa Swan, Principal Environmental Engineer (CPEng, NER) and Certified Professional in Erosion and Sediment Control (CPESC #8954). The audit of erosion and sediment control and water management for the Project included a site inspection of all the areas identified in **Section 2.3.3**.

During the audit period it was noted that the SWMP was under review, however it has not yet been approved. Reference during the audit was therefore made to Version 0.10 dated 24/10/2024. The SWMP includes a Spill Response Procedure (Appendix B) and the following Trigger Action Response Plans (TARPs):

- Receiving Waters Exceedance TARP
- Basin Overtopping Event TARP
- Spoil Non-Conformances TARPs

The Spill Response Plan and TARPs (with the exception of the Spoil Non-Conformance TARP) include the requirement to notify the EPA and other relevant agencies as required at appropriate times.

There were six incidents which occurred during the audit period which had the potential to cause water pollution (refer to **Section 5.3.2** for further detail).

Based on a review of the incident reports, the immediate response to the incidents and ongoing follow up actions are considered appropriate. It is noted that correspondence from the EPA in relation to prior incidents and dated 5 November 2024 indicated that "*with particular reference to the discharge to New Zealand Gully, the licensee did not carry out the appropriate comprehensive sampling to assess potential impact to waters. The EPA reminds Transgrid that a thorough approach must be taken when investigating all instances of discharge to waters. This includes implementing a comprehensive sampling strategy which includes source, confluence/mixing zone, upstream and downstream locations.*". Five of the six incidents which occurred within the monitoring period occurred after the receipt of this correspondence. These five incident reports were reviewed with particular focus on the water quality monitoring undertaken as part of the incident response. With the exception of one incident, where there was no water available to sample, it was noted that upstream, downstream and confluence/mixing zone water quality monitoring was undertaken as part of the monitoring response and is considered appropriate.

During the site inspection the sediment basin installed at the base of Track 8 was inspected. This sediment basin brings the total number of operational basins onsite to two (refer to **Plate 22** in **Appendix 5**). No discharges from either basin occurred during this reporting period. These basins form a critical part of the site's sediment control strategy and reflect the project's commitment to containing sediment-laden runoff before it can leave disturbed areas.

The Project's SWMP includes a Primary Erosion and Sediment Control Plan (ESCP) which sets the standards for the project's erosion and sediment controls (ESCs). The Primary ESCP is supported by progressive ESCPs which are updated regularly as site conditions change or prior to new works commencing. The Primary and Progressive ESCPs are informed by best-available practices, including key learnings from the Snowy 2.0 Main Works Project. These insights have informed the implementation of "better than Blue Book" controls, including the increased sizing of diversion bunds, the prioritisation of early rehabilitation, and the use of upslope catch drains to divert clean water early in the flow path—thereby reducing reliance on sediment basins. During the audit period Progressive ESCPs were supplied and reviewed for Track 4 (dated 27/11/2024) and Track 5c (02/09/2024).

During the site audit inspection, ESC measures on the western side of the development, near Maragle, were found to be well installed and maintained (refer to **Plate 23** and **Plate 24** in **Appendix 5**). Controls observed included mulch cover, soil binders, and rock lining applied across exposed surfaces, all of which were implemented to a high standard.

In contrast, observations from the eastern section at Lobs Hole around Track 4 and Track 5 identified several areas requiring improvement. This section includes more extensive active work zones and steeper terrain, where access tracks and tower pads are being constructed. According to the Progressive ESCPs for Track 4, erosion controls should primarily consist of stabilised or lined diversion bunds and/or mulch bunds installed along both sides of new tracks, directing runoff into sediment traps with rock filter dams to be placed at discharge points at regular intervals. However, field observations revealed while some sediment traps had been sprayed with soil binder, the outlet structures on many did not include rock filter dams at discharge points or were overflown with sediment in the outlet, contrary to the Progressive ESCP requirements (refer to **Plate 25**, **Plate 26**, **Plate 27** and **Plate 28** in **Appendix 5**).

Moreover, the Progressive ESCP indicates that bunds will incorporate returns with regular "lined spillway weirs" and it was noted that few of the proposed "lined spillway weirs" had been installed, and those that were observed had often been sprayed with soil binder but not fully lined in accordance with design specifications. Within the progressive ESCPs provided and observed there were no specified timing requirements which applied to inclusion of rock filter dams for sediment traps or lining of spillway weirs on bunds. To address these issues, it is recommended that the installed erosion and sediment controls in the Eastern Section—particularly around Tracks 4 and 5—are reviewed to ensure they align with the prescribed controls in the Progressive ESCPs. Where practicable, the Progressive ESCPs should be updated to include enhanced ESC measures, with a particular focus on ensuring sediment trap outlets incorporate rock filter dams as indicated in the Progressive ESCPs.

The audit also noted the implementation of erosion and sediment controls around the temporary Sheep Station Creek Bridge. The temporary bridge also includes a lip along the edges of the bridge and geofabric slung underneath the bridge deck to catch sediment. While the controls were appropriately installed around the structure, sediment accumulation was observed on the bridge deck within the lip. This sediment is likely being washed into Sheep Station Creek during rain events, as evidenced by the presence of sediment on the structural beams beneath the bridge and sediment on the geofabric slung underneath the

bridge deck. To prevent the mobilisation of sediment into the creek, it is recommended that sandbags or a similar form of control be placed along the outer edges of the bridge deck, where it is safe to do so, to contain and redirect sediment-laden water away from the watercourse or more frequent removal of sediment on the bridge deck is undertaken to reduce the build-up of sediment on the bridge deck.

During the audit, it was not evident whether erosion and sediment controls had been installed above the 2 year Average Recurrence Interval (ARI) flood level for Sheep Station Creek, as recommended in Section 5.3.2(c) of Managing Urban Stormwater: Soils and Construction (Landcom, 2004). To ensure compliance with best practice, it is recommended that a targeted survey be undertaken to confirm that erosion and sediment controls—particularly sediment fences near Sheep Station Creek—are situated outside of the 2-year ARI where practicable. This would minimise the risk of control failure and subsequent pollution during flood events.

The audit confirmed that the Project continues to follow a staged clearing approach to reduce the size of open catchments and associated volumes of dirty water runoff. Clean water diversion catch drains are being prioritised during site establishment works. As bulk earthworks progress, catchment shaping is being applied to further subdivide areas and refine the sizing and placement of erosion controls.

Water reuse practices remain consistent with the SWMP, and no new reuse opportunities were identified during this reporting period. Captured water within sediment controls is being reused for dust suppression via watercarts and through controlled irrigation. A water irrigation and disposal permit system (sighted) is in place to manage the reuse process and ensure irrigation is restricted to fully cleared zones only, in accordance with environmental requirements (J. Snape, pers. comm).

During the audit a review of the water quality monitoring results was undertaken. Water quality monitoring results have been posted on the Project's website up to January 2025. No water quality monitoring results were sighted for the period of February 2025 to present. It is recommended that, if available, the water quality monitoring results for the period February 2025 to present be published on the Project's website as soon as possible. Review of the monthly water quality monitoring reports indicates exceedances of various parameters at various locations and at various timeframes across the project site. To date the water quality monitoring reports have not indicated that exceedances are likely to be a result of the construction activities of the Project.

5.7 Site Audit Inspection

A comprehensive site inspection of the active construction areas across the Project alignment was conducted as part of the site audit. The inspection encompassed all locations specified in **Section 2.3.3**, ensuring a thorough coverage of key operational areas.

During the inspection, the Maragle Project Construction Compound was observed to be well maintained, with all areas managed to an appropriate standard. General housekeeping practices were effectively implemented, keeping the area free of litter, with waste properly sorted into designated bins. Chemical storage facilities were found to be compliant, with all chemicals securely contained within appropriate bunded areas to mitigate potential spill risks (refer to **Plate 29** in **Appendix 5**).

Additionally, fire safety provisions were in place. Firefighting equipment was readily available, with clear signage and accessible locations. Notably, the fire tank was observed to be full and correctly signposted to ensure visibility in case of emergency.

Erosion and sediment control measures appeared to be in place and functioning effectively. Rock checks and diversion drains were found to be well maintained, contributing to effective water management on-site. Spill kits were strategically located adjacent to the Maragle Substation Project Area, fully stocked, and accessible in the event of a spill. Furthermore, the sediment basin was inspected and found to be in operational condition (refer to **Plate 30** in **Appendix 5**).

During this audit period, a significant amount of civil works had been completed within the Maragle Substation Project Area, including the construction of multiple gantries and the ongoing installation of the auxiliary building (refer to **Plate 31** and **Plate 32** in **Appendix 5**).

Materials within the Maragle Substation Project Area were observed to be systematically organised into designated stockpiles, each clearly signposted for easy identification and inventory management. All construction equipment observed on-site was in good condition, appearing to be well maintained and operated in a safe and efficient manner (refer to **Plate 33** in **Appendix 5**).

Wheel wash stations were observed in both Project Areas East and West to ensure that vehicles and equipment remain free of weeds, seeds, and pathogens when entering or exiting the site (refer to **Plate 34** in **Appendix 5**). Rumble grids were installed at the entry/exit points into Elliot Way and other access points, such as Track 10 (refer to **Plate 35** in **Appendix 5**); however, during the audit, some dirt was observed being tracked onto Elliot Way. It is recommended that all contractors and employees be reminded of the requirement to use the wheel wash when exiting the site which may be facilitated through the use of regular toolbox talks and signage installed at the point of exit directing vehicles into the wheel wash.

Signage for management areas impacted by *Phytophthora sp*. was observed during the audit, particularly along Track 10, where large areas were designated as 'Biosecurity Zones' (refer to **Plate 36** in **Appendix 5**). Consistent with the previous audit, QR codes were continued to being used to inform personnel about the necessary procedures and actions to prevent the potential spread of pathogens from cleared areas. Additionally, portable pump packs for disinfecting footwear and equipment were observed, reinforcing biosecurity measures (refer to **Plate 37** in **Appendix 5**).

The Lobs Hole Project Compound was included in the inspection and was observed to be well maintained. During the inspection, chemical and hydrocarbon storage containers were found to be well organised and in good condition. Recycling programs were actively implemented, with waste segregation measures in place and designated bins available to use (refer to **Plate 38** in **Appendix 5**). Firefighting equipment was readily available at the compound, and the water supply tank at Lobs Hole was confirmed to be full and signposted (refer to **Plate 39** and **Plate 40** in **Appendix 5**). However, waste management issues were noted with bins managed by the UGL subcontractor Ocon. Waste segregation was not being properly implemented, with oily rags observed in the general skip bin (refer to **Plate 41** in **Appendix 5**). It is recommended that weekly inspections conducted by UGL include oversight of subcontractor operations to ensure consistent waste management practices across the site.

During the inspection of the Project West, Wallaces Creek was inspected to assess the effectiveness of the Project's erosion and sediment controls. Initially, the controls in place appeared to be well maintained; however, upon closer inspection specifically near the creeks edge (refer to Plate **21** in **Appendix 5**), it was evident that some controls had not been properly maintained or installed During the audit, it was unclear whether this area falls within the approved development boundary, or if it is located within a joint management area. Sediment fences were not adequately dug into the ground, leaving gaps that could

allow sediment to enter the creek. It is recommended that erosion and sediment controls at Wallaces Creek be included in pre- and post-rainfall inspections to ensure they are well maintained before a rain event.

The Sheep Creek Station Bridge (temporary) was also observed and confirmed to be operational, showing significant activity compared to the previous audit. Erosion and sediment control measures were installed and functioning. However, sediment build up was present on the bridge (refer to **Plate 42** in **Appendix 5**). Sediment was also observed in the creek, but discussions with Jason Snape from Transgrid indicated that this was likely attributed to upstream sources rather than project activities.

Track 8 was a focal point of the inspection due to the number of incidents that have occurred within this area during the audit period. In response to corrective actions outlined in incident reports, the Project has installed a number of erosion and sediment controls, including the installation of a new sediment basin (refer to **Plate 22** and **Plate 43** in **Appendix 5**). The steep terrain of the area makes it highly susceptible to localised rainfall events, which have resulted in exceedances. Additionally, the risk of localised landslides remains a concern, as they could contribute to high sediment loading in both the dirty and clean water diversions that eventually lead into Wallaces Creek.

Regeneration efforts along Track 8 appeared to be progressing well, with various plant species growing. While no formal BAM plots were undertaken during the inspection, a visual assessment indicated that partial clearing efforts have been conducted effectively within this area (refer to **Plate 5** in **Appendix 5**).

The site inspection confirmed that construction activities were being carried out generally in accordance with the conditions of the development consent and respective environmental management plans. Overall, proactive site management was evident, with key environmental controls in place and continued improvements being made in response to audit findings.

6.0 Recommendations and Opportunities for Improvement

A summary of recommendations and opportunities for improvement identified as an outcome of the audit process is provided in Table 6.1.

Table 6.1 Recommendations

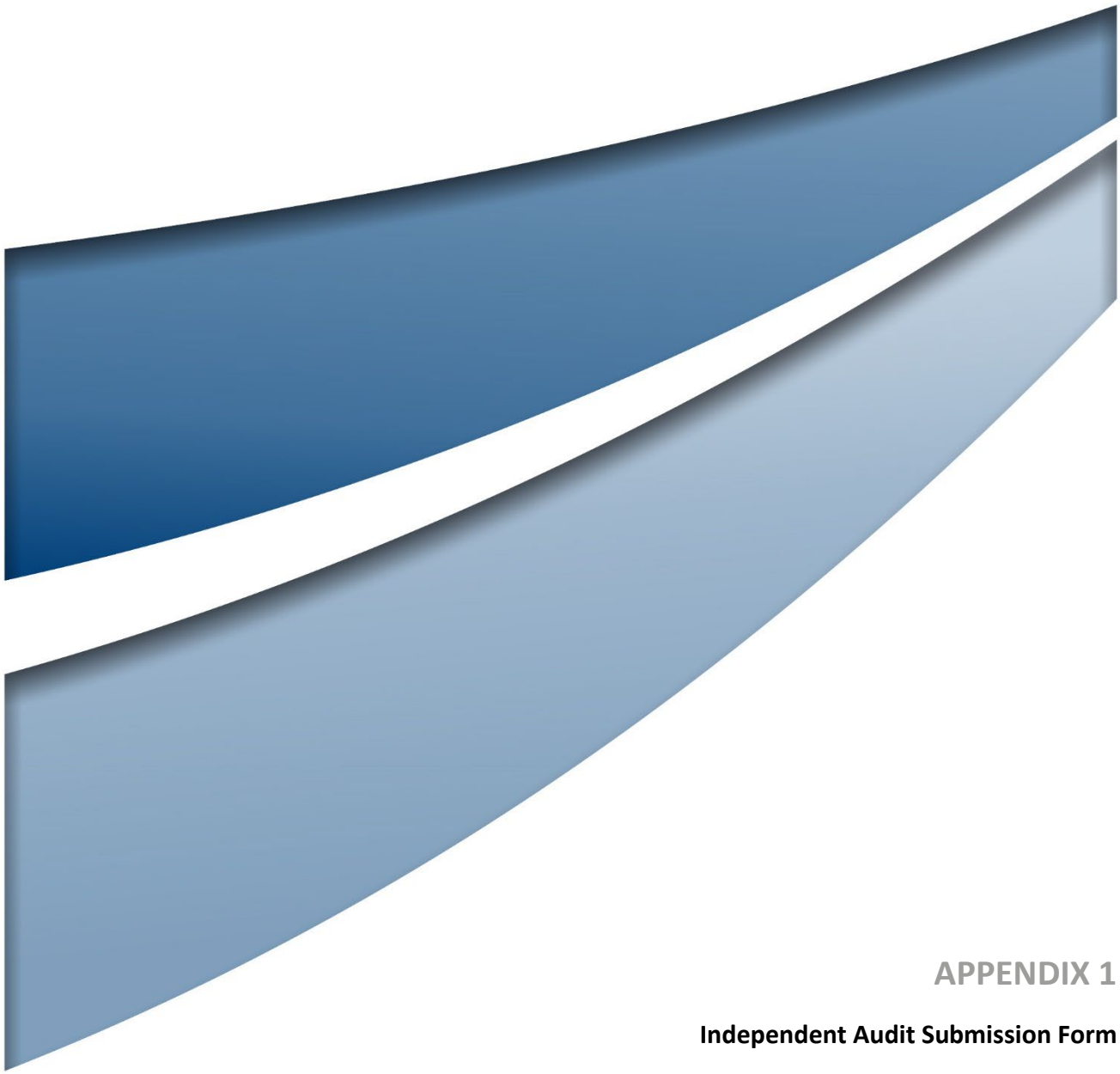
Condition / Issue	Recommendation
SSI 9717 – MOD 1 Infrastructure Approval	
A5	It is recommended that Transgrid notify the Planning Secretary of any plans that, while not required under this Infrastructure Approval, are required by the EIS to ensure consistency with Condition A2 (c). Additionally, clarification should be sought to confirm whether submission dates for any such plans have been formally extended and appropriately communicated to the Planning Secretary.
A9	It is recommended that, in future instances where stakeholder involvement is required, Transgrid follows up on any agreed actions via email to ensure a clear and documented communication trail.
A13	It is recommended that all contractors and personnel be reminded of the requirement to use site wheel wash facilities where installed and applicable, and to ensure vehicles arrive and depart the site clean and free of soil, weeds, seeds, and pathogens. This could be reinforced through regular toolbox talks and the installation of clear signage at site exit points.
B7	It is recommended that the spoil register be regularly maintained and updated to accurately record ongoing spoil movements, with updates occurring at intervals no greater than one month.
B10	It is recommended that the installed Erosion and Sediment Controls and Progressive Erosion and Sediment Control Plans (PESCP) in the Eastern Section of the development, particularly from Track 4 to Track 5, are reviewed to ensure installed controls are compliant with the PESCP. In particular, focus should be given to ensuring that bunds include regular returns with regular lined spillway weirs and that the outlets of sediment traps have rock filter dams placed at the discharge points as per the PESCP.
B14	It is recommended to prevent ingress of sediment into Sheep Station Creek from the temporary bridge deck, sandbags or similar (where safety permits) are installed along the outermost edges of the temporary bridge deck to prevent sediment being washed into the creek or more frequent removal of sediment on the bridge deck is undertaken to reduce the build-up of sediment on the bridge deck.
B15	It is recommended that a survey of the installed Erosion and Sediment Controls around Sheep Station Creek should be undertaken to validate that installed controls (notably installed sediment fences) lie outside of the 2-year Average Recurrence Interval (ARI) (where practical) to minimise potential impacts from concentrated water flows (i.e. loss of materials and pollution of waterways during flood events).
B16	It is recommended that an upper and lower range Site-Specific Guideline Value (SSGV) should be graphed in the main body of the Monthly Monitoring Reports to allow for easy assessment of the impacts of the development on pH.
B21	It is recommended the revised Consistency Assessment be prepared to provide further assessment of whether disturbance impacts to species polygons are consistent with the project approval and credit requirements identified in the Biodiversity Development Assessment Report.

Condition / Issue	Recommendation
	It is recommended that an independent ecological assessment be commissioned to verify whether environmental harm has occurred as a result of the use of a forestry mulcher, excessive mulch deposition, and broadscale herbicide application within the Easement Clearing Zones (ECZs) and Hand Clearing Zones (HCZs) of the development. The assessment should: • Evaluate the extent of impacts to retained shrub and groundcover vegetation, • Determine whether the soil seedbank or other regeneration processes have been adversely impacted as a result of the heavy application of mulch, • Identify any potential ongoing risks to ecosystem recovery, • Review vegetation integrity scores and • Recommend appropriate remedial and corrective actions, including restoration of groundcover, removal or redistribution of excessive mulch, and review of vegetation management practices. The findings of the independent assessment should be documented in a written report and used to inform any necessary revisions to the Biodiversity Management Plan and associated clearing procedures to prevent recurrence.
	It is recommended that the Easement Clearing Zones (ECZ) areas west of Track 1 on the Project West site and any other areas (Project East and Project West sites) not meeting the long-term vegetation integrity targets at the completion of clearing be classified and mapped as heavily impacted due to impacts associated with deep cover of woodchip deposited during clearing operations. Heavily impacted areas should be subject to rehabilitation in accordance with the Rehabilitation Management Plan which is in preparation. Remedial works west of Track 1 on the Project West site are required to address the harm caused to managed shrub and groundcover vegetation zones. Remedial measures should include: • Reduction of woodchip cover and depth to expose soil for native plants to regenerate, this will need to be undertaken progressively and in a sensitive manner so that existing native vegetation is not removed and erosion and sediment control issues do not occur. • Monitoring and reporting on native plant regeneration for the ECZ area west of Track 1. • Direct seeding of collected seed and/or propagation and planting of plants from collected seed within the parts of the ECZ west of Track 1 (subject to further approval from FCNSW). • Monthly weed monitoring and monthly targeted weed control during the growth period for any weed infestations. • Installation of fauna friendly temporary exclusion fencing to prevent feral horses and deer from grazing on regenerating plants and transporting weeds into the ECZ area west of Track 1 (subject to further approval from Forestry Corporation of New South Wales).
	It is recommended that Transgrid use a targeted application method (such as back pack sprayers) for the use approved herbicides in partial clearing zones, to ensure targeted weed control is occurring and herbicide does not harm retained shrubs and other native vegetation. Foliar application of herbicide is not considered to be a suitable method for clearing or maintenance of broad areas of regrowth eucalypts in the Easement Clearing Zones. Monitoring of areas treated with broad application of Grazon Extra should be undertaken and if areas of dieback of retained shrub and groundcover vegetation has occurred these areas should also be classified as heavily impacted areas and subject to rehabilitation in accordance with the Rehabilitation Management Plan which is in preparation.

Condition / Issue	Recommendation
	It is recommended that, in future instances where rainfall events may potentially impact Booroolong Frog habitat, Transgrid ensure National Parks and Wildlife Services is notified within two hours of identifying the risk. All such notifications should be recorded in a central register to ensure accountability and traceability.
	It is recommended erosion and sediment controls near Track 8 and Wallace's Creek should be properly installed and maintained to prevent runoff into the creek. This may require coordination with Future Generation Joint Venture.
	It is recommended that erosion and sediment controls near the Booroolong Frog habitat be included in both pre- and post-rainfall inspections for the development. This will help ensure the controls are functioning effectively and provide ongoing protection for the nearby Booroolong Frog habitat.
	It is recommended that, in future clearing activities, any deviations such as incorrect rope colours or inadequate boundary marking should be documented and addressed promptly. All delineation measures should be recorded in a central register to support traceability and compliance monitoring.
	Prior approval should be sought for variations to staged-clearing requirements by CHPR, NPWS, FCNSW and DCCEEW.
	It is recommended that reporting procedures for pre-clearance checklists be reviewed and improved to ensure consistency across reporting structures and improve clarity, accuracy, and compliance.
	It is recommended that further assessment of the current known extent of *Caladenia montana* is undertaken to demonstrate that no more than 9.35 ha of habitat for this species will be cleared for the development or seek approval for additional clearing of habitat.
	It is recommended that all steps of the Unexpected Threatened Species Procedure should be followed and the relevant requirements implemented for the observations of *Caladenia montana* outside of the mapped species polygon assessed in the final Biodiversity Development Assessment Report, including notifying all relevant stakeholders and authorities in accordance with regulatory requirements.
	It is recommended weed mapping within and adjacent to (with a 50m buffer of) the Project area is undertaken bi-annually in accordance with Section 6.2 of the Weed and Pathogen Control Monitoring Program.
	It is recommended that the weed spraying register be updated to include details of spraying methodologies (including the adoption of backpack sprayers only in areas of partial clearing/where retained vegetation is required), observations of surrounding vegetation, justification for weather-related decisions, and photographic evidence where practical.
	Implement restricted access and hygiene measures in areas experiencing dieback of *Banksia canei* until further soil testing is undertaken. Notify NPWS, CHPR and FCNSW regarding soil testing and undertake mapping and adaptive management as necessary to comply with the Biodiversity Management Plan.
B22	It is recommended the Transgrid updates relevant digital mapping and removes colour-specific rope demarcation around areas or sites that have been confirmed to not be heritage items to prevent worker confusion.
B24	It is recommended Transgrid consider consultation regarding all relevant activities pertaining to the management of Aboriginal cultural heritage be undertaken with the twenty-one (21) Registered Aboriginal Parties (RAPs) listed in Section 3.2 of the Aboriginal Heritage Management Plan.
	It is recommended that Transgrid provide a summary of unexpected finds identified to date, as well as completed clearance works, and invite all Registered Aboriginal Parties to a workshop.

Condition / Issue	Recommendation
	The purpose of the workshop would be to discuss the cultural heritage finds, review their context in relation to previously identified cultural heritage values, and assess whether the finds align with the current archaeological model. In particular, Elders and identified Knowledge Holders should be engaged to discuss the findings and, where possible, be given the opportunity to visit Aboriginal sites of interest. The outcomes of the workshop and/or site visits may be used to inform potential updates to the existing Heritage Management Plan, where relevant.
	It is recommended the Weekly Environmental Checklists template be revised to include inspections of 'sensitive areas' identified in the Aboriginal Heritage Management Plan.
B29	It is recommended Transgrid updates the existing dilapidation report to assess the requirements outlined by Condition B29(a) as per the requirements of the Road Maintenance Agreement.
B32	It is recommended that all relevant personnel, contractors and delivery drivers are aware of the requirements under the Traffic and Transport Management Plan for loaded vehicles travelling to site to be covered and contained.
	It is recommended monthly inspections of transport routes be undertaken as required by Section 8.5 of the approved Traffic and Transport Management Plan to ensure compliance, safety, and effective traffic management. These inspections should be appropriately recorded and documented.
	It is recommended that the HSE Weekly Inspection form be revised to incorporate traffic monitoring. This will help ensure the development minimises impacts on local traffic, including school bus routes, and preventing the incidence of queuing on public roads.
B38	It is recommended that the management commitments of the 11 kV Line Rehabilitation Strategy be included in the relevant compliance registers to ensure all required measures are met.
B42	It is recommended that the Emergency Plan be submitted to the Local Emergency Management Committee and NSW State Emergency Service for comment as soon as practicable given it has not been submitted annually as required.
	It is recommended that Transgrid notify NSW Rural Fire Service Brigade, Forestry Corporation of NSW, Fire and Rescue NSW, and National Parks and Wildlife Service of the evacuation drill that was held and confirm their intention to ensure they are invited to attend future drills.
	It is recommended that Appendix F Site Environmental Sensitivities of the Emergency Plan be updated to reflect relevant and current contacts, as it is currently outdated.
B43	It is recommended at the Lobs Hole site that waste under the responsibility of Ocon is included in weekly inspections undertaken by UGL to ensure waste is segregated appropriately across the whole development.
B46	It is recommended Transgrid obtain appropriate records and waste dockets from JJ Richards and Belletes for all waste removed from Project Site East and West for disposal as required by condition B46.
C2	It is recommended going forward for completeness that all plans including strategies should be included in the Management Plan Summary Document Control Register to accurately document the requirement of condition C2 has been implemented.
C3	It is recommended that the Biodiversity Management Plan and Soil and Water Management Plan be revised to incorporate the recommendations outlined in previous construction audits, to ensure appropriate mitigation measures can be effectively implemented onsite. This should be treated as a priority and the revised plans implemented. Consultation with DPHI may be required to facilitate close out of the Departments review and approval of these updates.

Condition / Issue	Recommendation
C4	It is recommended that Transgrid notify the Department, National Parks and Wildlife Services and Forestry Corporation of New South Wales in writing that Stage 2 works have commenced.
C11	It is recommended the Additional Easement Strategy is uploaded to the Project website.
	It is recommended the Project website is updated regularly to include monitoring results of the development.
Amendment Report Commitments	
B4	It is recommended that reporting procedures for pre-clearance checklists be reviewed and improved to ensure consistency across reporting structures and improve clarity, accuracy, and compliance.
W3	It is recommended to update the weekly inspection checklist to include a section/prompt regarding tannin leachate management.
W10	It is recommended that the environmental inspection weekly checklist and post- rainfall inspection checklists are updated to include a compliance measure relating to the conditions and controls installed around waterway crossings and access tracks to prompt staff completing these inspections to check all tracks and crossings remain in good condition.
HA27	It is recommended that the Hot Works procedure be reviewed prior to the start of the next bushfire season.



APPENDIX 1

Independent Audit Submission Form

Appendix 1 - Independent Audit Report Declaration Form

Independent Audit Report Declaration Form

Project Name:Snowy 2.0 Transmission Connection Project

Consent Number: SSI 9717

Description of Project: Construction and operation of new 330 kilovolt (kV) transmission lines and associated infrastructure connecting the Snowy 2.0 Main Works Project to the existing electricity grid.

Project Address: Elliot Way Maragle NSW 2653 (Snowy Mountains)

Proponent: Transgrid

Title of Audit:IEA of Snowy 2.0 Transmission Connection Project Construction Audit 3

Date: 3 July 2025

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

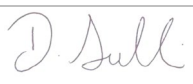
- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000; and

b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

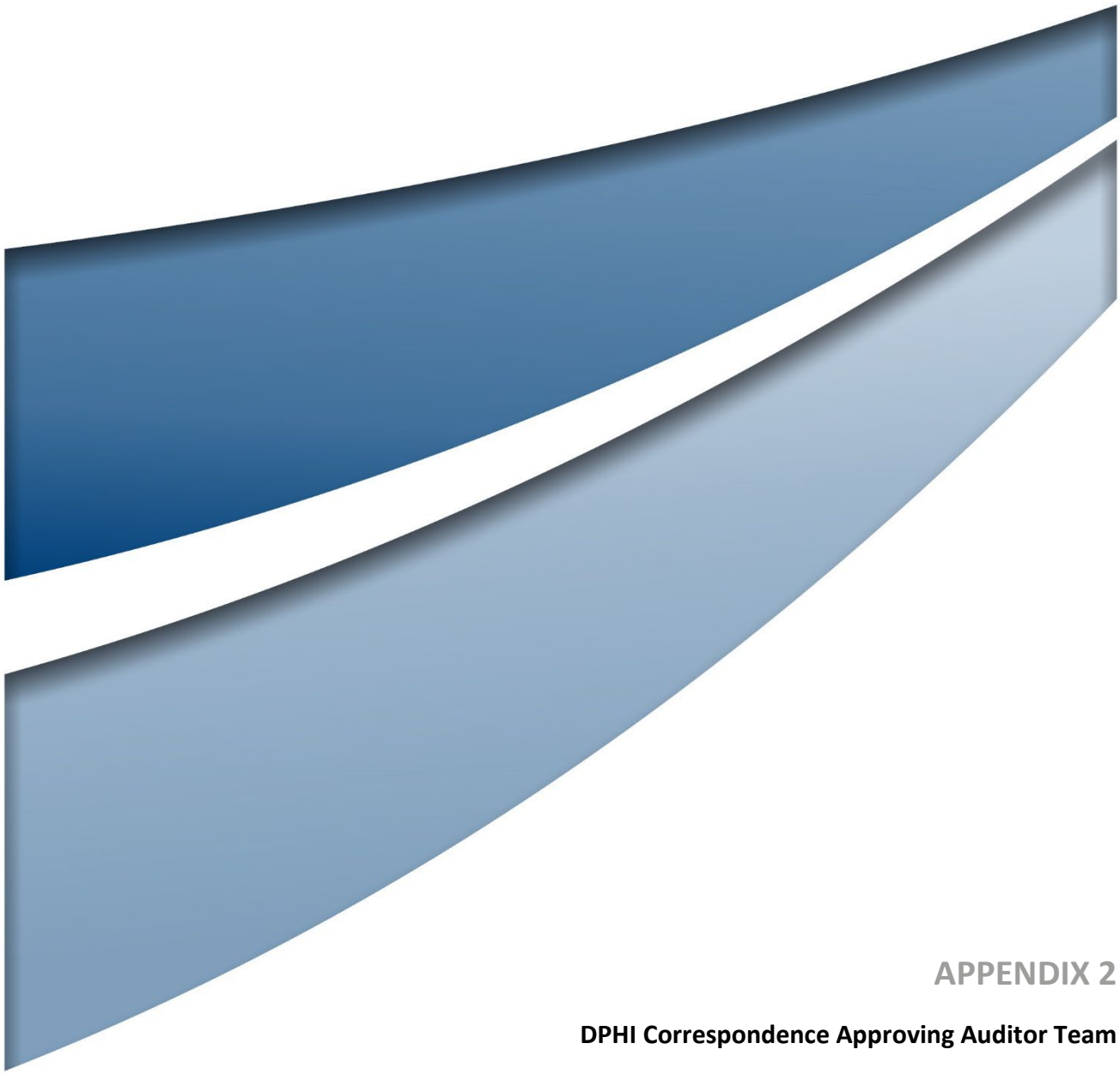
Name of Auditor: Daniel Sullivan

Signature: 

Qualification: BEnvSc, Exemplar Global Internationally Certified Lead Auditor (No. 113202)

Company Address:75 York Street Teralba NSW 2284

Company: Umwelt (Australia) Pty Limited



APPENDIX 2

DPHI Correspondence Approving Auditor Team

Department of Planning and Environment

Mr Andrew Buttigieg
180 THOMAS STREET
HAYMARKET NSW 2000
27/04/2023

Dear Mr Buttigieg

Snowy 2.0 - Transmission Connection - (SSI-9717)
Independent Environmental Audit Team approval

Reference is made to the post approval documents regarding the Independent Environmental Audit (IEA) timing schedule and the suitability of the Audit team's qualifications, experience and independence, to undertake the IEA and prepare the IEA report, submitted to the Department of Planning and Environment (the department) for the Snowy 2.0 - Transmission Connection on 22 March 2023 as required Condition C10 of SSI 9717 (the approval).

Having considered the qualifications and experience of the audit team from Umwelt Australia Pty Ltd the Planning Secretary endorses the appointment of the audit team listed below, to undertake the IEA and prepare the IEA report in accordance with Condition C10 of the approval.

Mr Daniel Sullivan - Lead Auditor;
Mr Chris Bonomini - Principal Engineer – Water Process and Risk;
Mr James Garnham - Senior Ecologist; and
Mr Luke Wolfe - Principal Archaeologist.

In respect to the request of relief from the counting of three (3) winter shutdown months in the IEA audit frequency of every year of the construction phase, the department is of the opinion that the snowmelts are one of the major potential impact times for erosion/sediment issues associated with the site and hence this 3 months-time period is to be included in the 26 weeks.

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

The Department reserves the right to request an alternate auditor or audit team for future audits. Notwithstanding the agreement for the above listed auditor for this Project, each respective project approval requires a request for the agreement to the auditor be submitted to the Department, for the consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor will be considered.

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

Yours sincerely

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

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-9717-PA-38

Mr Andrew Buttigieg
Project Manager - Snowy 2.0 Transmission Connection
The Trustee for the NSW Electricity Networks Operations Trust
ABORIGINAL COUNTRY
180 THOMAS STREET
HAYMARKET New South Wales 2000
05/02/2024

Sent via the Major Projects Portal only

Subject: Snowy 2.0 - Transmission Connection – Independent Environmental Audit - Auditor replacement approval request 2 February 2024

Dear Mr Buttigieg

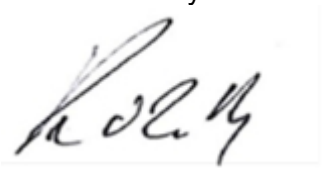
Reference is made to your post approval matter, SSI-9717-PA-38, requesting the Planning Secretary's approval of an alternate suitably qualified, experienced, and independent person to assist in the Independent Audit of the Snowy 2.0 - Transmission Connection - submitted as required by C10 of SSI 9717 (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 2 February 2024.

NSW Planning notes that Mr Chris Bonomini has moved on to a role outside of Umwelt Australia Pty Ltd and is no longer available for the endorsed audit team. NSW Planning has reviewed the replacement auditor nomination and based on the information you have provided is satisfied that Ms Melissa Swan is suitably qualified, experienced, and independent. Consequently, as nominee of the Planning Secretary, I approve the appointment of Ms Swan as part of the IEA team.

Please ensure this correspondence is appended to the Independent Audit Report.

Should you wish to discuss the matter further, please contact me on 0429400261 on 0429400261 or email compliance@planning.nsw.gov.au

Yours sincerely



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

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSI-9717-PA-42
Mr Andrew Buttigieg
Project Manager - Snowy 2.0 Transmission Connection
The Trustee for the NSW Electricity Networks Operations Trust
180 THOMAS STREET
HAYMARKET New South Wales 2000
15/02/2024

Subject: Snowy 2.0 - Transmission Connection – Independent Environmental Audit - alternate auditors approval

Dear Mr Buttigieg

Reference is made to your post approval matter, SSI-9717-PA-42, requesting the Planning Secretary's approval of an additional and an alternate suitably qualified, experienced, and independent persons to assist in the Independent Environmental Audit (IEA) of the Snowy 2.0 - Transmission Connection - submitted as required by C10 of SSI 9717 (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 14 February 2024.

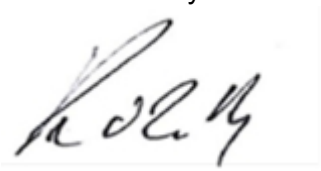
NSW Planning notes that Mr James Graham is unable to participate in the IEA due to personal reasons.

NSW Planning has reviewed Mr Graham's replacement auditor nomination and based on the information you have provided is satisfied that Mr Jacob Manners (Principal Ecologist and Accredited BAM Assessor) is suitably qualified, experienced, and independent. In addition, NSW Planning have reviewed Mr Joshua Wheatley (Environmental Consultant) information, as assistant auditor to Mr Daniel Sullivan and is satisfied he is suitably qualified, experienced, and independent. Consequently, as nominee of the Planning Secretary, I approve the appointment of Mr Manners and Mr Wheatley as part of the IEA team.

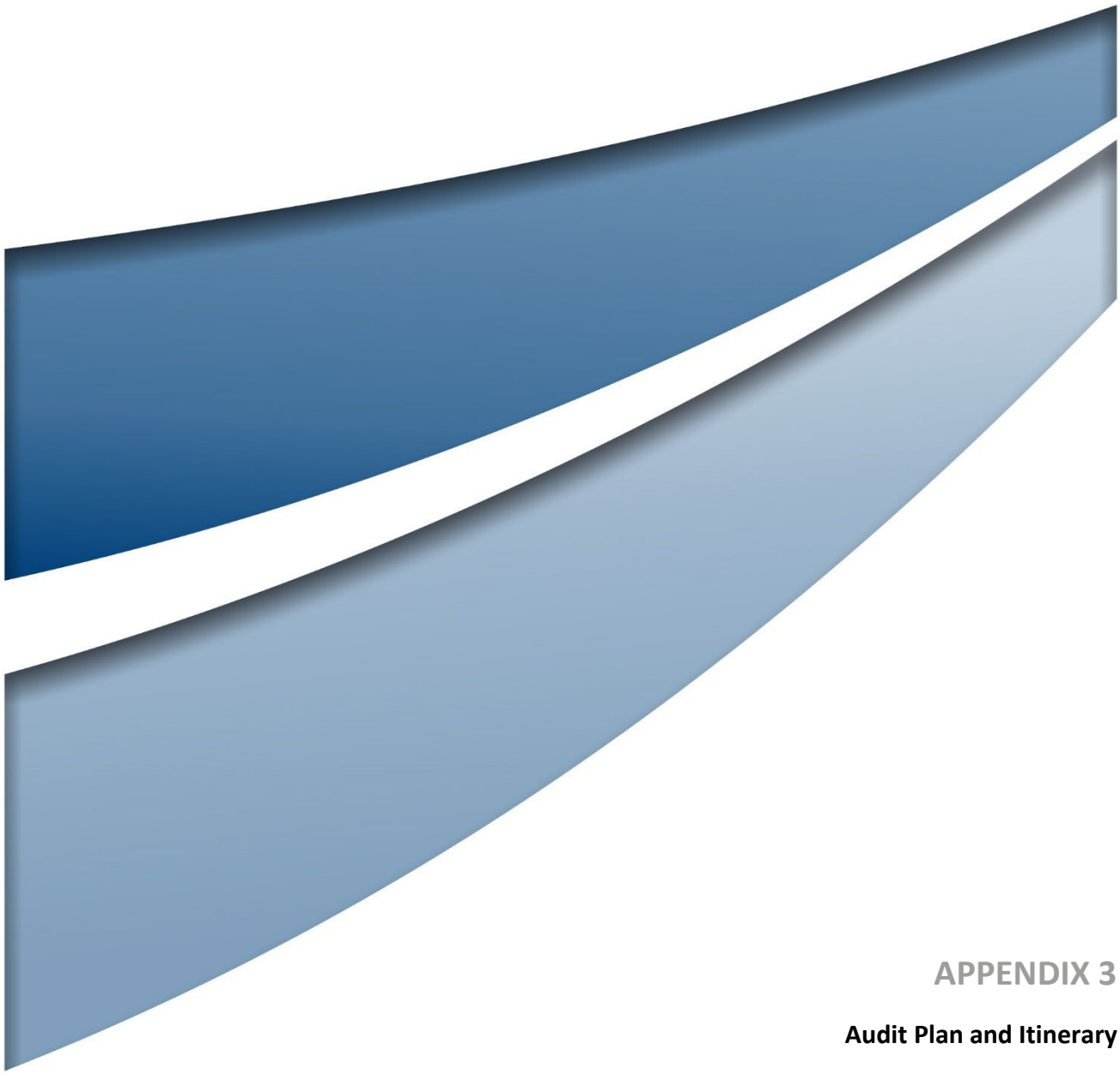
Please ensure this correspondence is appended to the Independent Audit Report.

Should you wish to discuss the matter further, please contact me on 0429400261 or email compliance@planning.nsw.gov.au

Yours sincerely



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



APPENDIX 3

Audit Plan and Itinerary

Transgrid

Snowy 2.0 Transmission Connection Project SSI 9717 Independent Construction Audit 3

Audit Plan

To:	Jason Snape (Transgrid)
From:	Umwelt (Australia) Pty Limited
Author:	Daniel Sullivan (Umwelt)
Date:	28 January 2025
Subject:	Snowy Hydro 2.0 Connection Project –Independent Construction Audit 3

Audit Period: 27 September 2024 – 13 March 2025

Site Audit Date: 11 – 13 March 2025

Audit Team:

Name	Role
Daniel Sullivan	Lead Auditor
Joshua Wheatley	Assistant Auditor
Jacob Manners	Biodiversity Specialist
Luke Wolfe	Aboriginal Archaeology Specialist
Melissa Swan	Sediment & Erosion / Water Specialist

1.0 Audit Scope and Objectives

In accordance with the Development Consent for SSI 9717 and the NSW Department of Planning, Industry & Environment's (DPIE) *Independent Audit – Post Approval Requirements* dated May 2020 (Independent Audit Requirements) an Initial Independent Audit is required to be completed for Snowy Hydro 2.0 Connection Project (the Project).

The scope and objectives of the Initial Independent Audit are to assess Transgrid's compliance with:

- All conditions of the Development Consent for SSI 9717 (dated 2 September 2022) that are applicable to the construction phase
- All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans and
- All environmental licences and approvals applicable to the development excluding environment protection licences issued under the *Protection of the Environment Operations Act 1997*.

The audit will also include:

- A review of the environmental performance of the development (including a comparison with the predicted impacts contained in the EIS, review of complaints and incidents registers and consideration of any feedback provided during agency consultation)
- A high-level assessment of whether Environmental Management Plans and sub-plans are adequate and
- Any other matters considered relevant by the auditor or the Department.

2.0 Audit Criteria

Reporting of compliance will be based on the compliance status descriptors as defined in the Independent Audit Requirements as shown in **Table 1**. No other terms may be used to describe the compliance status.

Table 1: Compliance Status Descriptors

Status	Description
Compliant (C)	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant (NC)	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered (NT)	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

3.0 Audit Process

Document Review: The documents listed in Part 1 of **Table 2** below will be reviewed prior to and during the audit to enable compilation of audit checklists and allow the auditor to gain an understanding of the site.

Agency Consultation: Consultation will be undertaken with Department of Planning, Housing and Infrastructure (DPHI) (formerly Department of Planning and Environment) with regard to the scope of the audit. During this consultation the Department may request that further consultation be undertaken with other parties including other agencies.

Site Inspection/Audit: Three days has been allowed for the on-site component of the audit. During the site inspection access is requested to all development areas and environmental aspects that form part of the Project. To maximise the time on site, documentation as discussed below will be reviewed prior to the site inspection.

An indicative itinerary for the site inspection is provided in **Table 3**. This will be revised and reissued as final prior to the site audit date.

During the audit, the following people are proposed to be interviewed (if available):

- Project Manager / Site Manager
- Senior Environmental Advisor;
- Site Environmental Leads;
- Relevant supervisors / personnel from key construction areas visited during the site inspections including those with responsibility for environmental management; and
- Other persons identified during the course of the audit (as relevant).

For the Opening and Closing Meetings, it is suggested that as a minimum these should be attended by the Project Manager/ Site Manager, Senior Environmental Advisor, relevant area supervisors and any other personnel nominated by Transgrid.

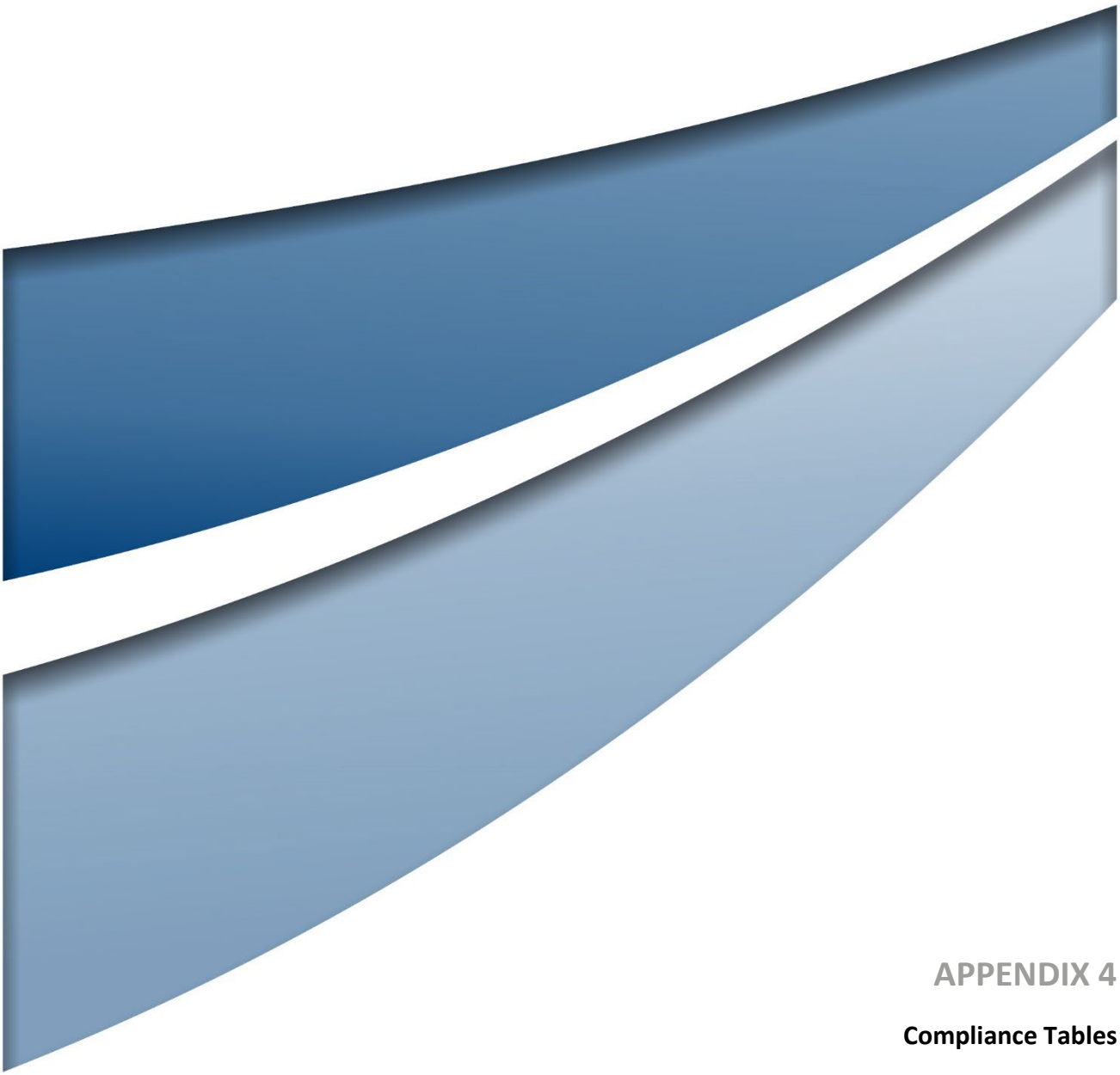
Table 2: Pre-Audit Documentation Requirements

Issue	Document	Status
Documentation Required Prior to Audit		
Environmental Documentation	Confirmation if any other Approvals or Licences have been required and obtained since the last audit (and copies if yes).	Required
	Copies of any notifications (including any written requirements or directions) given by Secretary under the approval since the last audit	Required
	Management Plans / Strategies- If any changes / amendments to management plans have occurred please provide copies of updated approved plans and details of what the changes were.	Required
	Copies of correspondence to relevant agencies for consultation, submission and approval of any revised plans	Required
	Details of any PINs received, and incidents reported within the audit period including reports	Required
	Complaints register from 27 September to date (audit period)	Required
	Aboriginal Heritage Salvage Report(s) relevant to the audit period (ie. since last audit)	Required
	Update on status of addressing actions from previous audit.	Required

Table 2: Indicative Itinerary for Site Inspection/Audit

Day/Time	Description	Personnel
Audit Day 1 (Tuesday 11 March 2025)		
9.00am - 9.30am	**Opening Meeting** • Introductions • Purpose of Audit • Confidentiality Arrangements • Audit Process and Timing	Manager/supervisor, environmental personnel and site personnel as invited by Transgrid
9:30am - 10:00am	**Presentation on Snowy 2.0 Transmission Connection Project and construction activities in Audit Period** • Transgrid personnel to present an overview of the progress of construction across the site, including outline of environmental management system and controls	Manager/supervisor and environmental personnel
10.00am - 12.00pm	**Documentation Compliance Review** • Review of SSI 9717 consent	Environmental personnel and appropriate site personnel as required
12.00pm - 12.30pm	**Lunch**	
12.30pm - 4.00pm	**Documentation Compliance Review (Cont.)** • Review of SSI 9717 consent (cont). • Close out of previous audit actions • Review key EIS commitments • Review activities against EIS • Regulator consult issues and audit feedback • Reportable incidents and complaints • Management plans commitments review • Training and communication	Environmental personnel and appropriate site personnel as required
4.00pm - 4.30pm	**Auditors Revision and End of Day 1**	Umwelt Auditor Only
Audit Day 2 (Wednesday 12 March 2025)		
8.30am – 9.00am	**Day 2 Morning Catchup** • Recap of Day 1 as needed • Plans for Day 2 and inspections	Environmental personnel and appropriate site personnel as required
9.00am – 12.00pm	**Specialist Auditors Documentation Compliance Review – Biodiversity, Aboriginal Archaeology and Water / SEC** • Review key EIS commitments • Review activities against EIS • Regulator consult issues and audit feedback • Reportable incidents and complaints • Management plans commitments review	Environmental personnel and appropriate site personnel as required
12.00pm – 12.30pm	**Lunch**	
12:30pm – 2:30pm	**Field Inspection (inc Biodiversity, Aboriginal Archaeology & Water Specialist)**	Environmental personnel and appropriate site

	Lobbs Hole Site (Eastern Alignment) • All Cleared Areas • Any areas where pre-clearing works are planned / commenced • Sensitive sites where mitigation / management is required • Water management infrastructure and areas	personnel as required
2:30pm – 4:30pm	**Field Inspection (inc Biodiversity, Aboriginal Archaeology & Water Specialist)** **Maragle Site (Western Alignment)** • All Cleared Areas • Any areas where pre-clearing works are planned / commenced • Sensitive sites where mitigation / management is required • Water management infrastructure and areas	Environmental personnel and appropriate site personnel as required
4:30pm – 5:00pm	**Biodiversity, Aboriginal Archaeology & Water Specialist Wrap Up** • Brief close out to confirm any initial findings and outstanding RFI approach, etc	Environmental personnel and appropriate site personnel as required
Audit Day 3 (Thursday 13 March 2025)		
9.00am - 9.30am	**Day 3 Morning Catchup** • Recap of Day 2 as needed • Plans for Day 3	Environmental personnel and appropriate site personnel as required
9.30am - 12.00pm	**Documentation review** • Time to review any additional documentation requested on Day 1 & 2 or during site inspections	Environmental personnel and appropriate site personnel as required
12.00pm - 12.30pm	**Lunch**	
12.30pm - 2.00 pm	**Auditor Revision and Preparation for Closeout Meeting**	Umwelt Auditor Only
2.00pm - 2.30 pm	**Close Out Meeting** • Overview of findings • Confirmation of outstanding items or documents required • Confirm audit review and completion process	Manager/supervisor, Environmental personnel and site personnel as invited by Transgrid



APPENDIX 4

Compliance Tables

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
SCHEDULE 2					
PART A ADMINISTRATIVE CONDITIONS					
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT					
A1.	In meeting the specific performance measures and criteria of this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction, operation, rehabilitation, upgrading or decommissioning of the development.	Environmental Management Strategy (Rev 0.08) dated 05/08/2024	Compliant	Confirmed during previous Construction Audits, the Maragle 330kV Switching Station and 330kV Transmission Line Connections Environmental Management Strategy (EMS) document (sighted) provides the framework for environmental management for the Snowy Hydro 2.0 Transmission Connection Project. It also generally addresses the requirements of this Infrastructure Approval. Findings and observations made during the Construction Audit 3 and site inspection confirmed that Transgrid are continuing to implement and maintain the appropriate measures required under respective management plans aimed at preventing / minimising material harm to the environment. Consistent with previous Construction Audits, Transgrid alongside its Principal Contractor 'UGL' continue to utilise compliance tracking systems (sighted) to ensure they meet the specific performance measures and criteria set out by this approval. Outlined in Construction Audit 2, Transgrid anticipated they could be operating under a new compliance system by Construction Audit 3. Transgrid has since opted to not pursue a new system during this audit period and will continue to utilise existing compliance trackers to monitor and maintain compliance (J. Snape pers. comm). There were some reportable incidents during this audit period as described below in these compliance tables; however no material harm was recorded to occur to the environment and no action taken by regulatory agencies.	
TERMS OF APPROVAL					
A2.	The development must be carried out: (a) in compliance with the conditions of this approval; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS; and (d) generally in accordance with the Development Layout in Appendix 2.		**Non-compliant**	(a) The Snowy Hydro 2.0 Transmission Connection Project is being carried out generally in accordance with the conditions of this Infrastructure Approval and the EIS. **Non-Compliances against conditions have been identified during the audit period and are recorded in this table and in the main Audit Report.** (b) No written direction by the Planning Secretary has been received during the reporting period (J. Snape pers. comm). (c) No changes to layout during the audit period, however it is noted changes are expected to occur during the next audit period (J. Snape pers. comm). (d) All works during the reporting period were carried generally in accordance with the development layout outlined in Appendix 2.	**NC - 01**
A3.	The Proponent must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: (a) any strategies, plans or correspondence that are submitted in accordance with this approval; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and (c) the implementation of any actions or measures contained in these documents.		Not triggered	This condition has not been triggered during the audit period (J. Snape pers. comm).	
A4.	The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Noted		

<table>
<tr><th colspan="6">Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1</th></tr>
<tr><th>Condition No.</th><th>Requirement</th><th>Evidence Collected</th><th>Compliance Status</th><th>Independent Audit Findings and Recommendations</th><th>Unique ID on NC</th></tr>
<tr><td>A5.</td><td>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 C7.</td><td>RMP Extension Request Letter dated 15/10/2024
DPHI RMP Extension Request Approval Letter dated 06/11/2024
CPHR OVMP Extension Email Correspondence dated 31/10/25
NPWS OVMP Extension Email Correspondence dated 30/10/2025</td><td>Compliant</td><td>An extension request was submitted by Transgrid to the Planning Secretary during the audit period. The extension request was sought to extend the submission timeframe of the Rehabilitation Management Plan (RMP) extending the submission date from the 4 December 2024 to the 4 April 2025. An extension request was submitted on the 15 October 2024 and was approved on the 06 November 2024 by the Planning Secretary.
An additional request was made to extend the submission timeframe for the preparation of the Operational Vegetation Management Plan. This request was consulted via email with CPHR (formerly BCS) and NPWS, both of whom approved the extension. As a result, the submission deadline was extended by four months, with the new due date set for April 4, 2024. This change was reflected in the revised BMP, which was subsequently approved by the Planning Secretary. However, it remains unclear whether the Planning Secretary was aware of this extension. There is no verifiable evidence to support the Planning Secretary was made aware of this request.
No other requests were made to the Department during the audit period (J. Snape pers. comm).

Opportunity for Improvement: It is recommended that Transgrid notify the Planning Secretary of any plans that, while not required under this Infrastructure Approval, are required by the EIS to ensure consistency with Condition A2 (c). Additionally, clarification should be sought to confirm whether submission dates for any such plans have been formally extended and appropriately communicated to the Planning Secretary.</td><td></td></tr>
<tr><td colspan="6">LIMITS ON APPROVAL</td></tr>
<tr><td colspan="6">Restrictions on Disturbance Area and Native Vegetation Clearing</td></tr>
<tr><td>A6</td><td>The Proponent must comply with the restrictions in Table 1 below.
Table 1 Restrictions on Approval
Table 1 Restrictions on Approval<table><tr><th>Matter</th><th>Kosciuszko National Park</th><th>Bago State Forest</th><th>Total</th></tr><tr><td>Maximum Disturbance Area</td><td>81 ha</td><td>44 ha</td><td>125 ha</td></tr><tr><td>Maximum Native Vegetation Full Clearing</td><td>37 ha</td><td>34 ha</td><td>71 ha</td></tr><tr><td>Maximum Native Vegetation Partial Clearing</td><td>38 ha</td><td>9.2 ha</td><td>47.2 ha</td></tr></table>The areas in Table 1 relate to direct disturbance and clearing and do not include the indirect impacts of this disturbance and clearing.</td><td>UGL Clearing Progress Summary Excel Spreadsheet</td><td>Compliant</td><td>Confirmed during the Initial Construction Audit, clearing activities commenced on the 8 March 2024. The development continues to operate under a staged clearing permit system to ensure clearing is undertaken within the approved limits and areas (B. Toohey pers. comm). The extent of vegetation clearing under the Approval at the time of this audit period has been summarised in Table A1 below, as reported by Transgrid.
Table A1. Extent of Clearing<table><tr><th rowspan="2">Matter</th><th colspan="2">Kosciuszko National Park</th><th colspan="2">Bago State Forest</th><th colspan="2">Total</th></tr><tr><td>Current</td><td>Limit</td><td>Current</td><td>Limit</td><td>Current</td><td>Limit</td></tr><tr><td>Maximum Disturbance Area</td><td>56 ha</td><td>81 ha</td><td>39 ha</td><td>44 ha</td><td>95 ha</td><td>125 ha</td></tr><tr><td>Maximum Native Vegetation (Full Clearance)</td><td>30 ha</td><td>37 ha</td><td>31 ha</td><td>34</td><td>61 ha</td><td>71 ha</td></tr><tr><td>Maximum Native Vegetation (Partial Clearance)</td><td>26 ha</td><td>38 ha</td><td>8 ha</td><td>9.2</td><td>34 ha</td><td>47.2 ha</td></tr></table>The extent of clearing undertaken to date, as reported by UGL and Transgrid, is compliant with the restrictions outlined by Condition A6 (B. Toohey pers. comm).</td><td></td></tr>
<tr><td colspan="6">LAPSE OF APPROVAL</td></tr>
<tr><td>A7.</td><td>This approval will lapse if the Proponent does not physically commence the development within 5 years of the date on which it is granted.</td><td></td><td>Compliant</td><td>Confirmed during the Initial Construction Audit, the development commenced construction on the 4 December 2023, within 5 years of the date the development approval was granted.</td><td></td></tr>
</table>

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
EVIDENCE OF CONSULTATION					
A8.	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.	Summary_DCR_All_Plans Register received 28/02/2025	Compliant	(a) Confirmed during previous Construction Audits, all management plans as detailed in the sections below have been consulted with relevant parties prior to submission to the Planning Secretary. Details of additional consultation that has been undertaken during the audit period have been outlined in the conditions below. (b) Transgrid utilise multiple compliance tracking systems to ensure the details of consultation records are maintained. These tracking systems include a number of excel registers. As confirmed in previous Construction Audits, Transgrid continue to utilise and revise the Management Plan Summary Document Control Register (sighted). This register summarises and contains details of stakeholder consultation across all management plans for the development. This register also includes the outcome of the consultation, matters resolved and unresolved, status and details of any disagreement remaining between stakeholders and how the matters were addressed. In response to a recommendation from Construction Audit 2, the Management Plan Summary Document Control Register has been updated during the audit period to maintain a comprehensive record of all management plan reviews. This update ensures that all changes are documented, regardless of whether updates are required, allowing for a trackable record to support incident response and compliance monitoring.	
PROTECTION OF PUBLIC INFRASTRUCTURE					
A9.	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: (a) undertake any works on or in the vicinity of public infrastructure in consultation with the applicable public authority or service provider responsible for the public infrastructure; (b) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (c) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. (d) 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.	Maragle Visitor Sign on Sheet dated 2/10/2024	Compliant	(a) No works were undertaken during the audit period on or in the vicinity of public infrastructure (J. Snape pers. comm). (b) No damage or relocation of public infrastructure has occurred during the audit period (J. Snape pers. comm). In Construction Audit 2, minor damage to Elliot Way near Track 2 was noted. Consultation was ongoing at the time of Construction Audit 2. UGL highlighted that a site inspection was undertaken by NPWS during this audit period on the 2 October 2024. According to UGL (B. Toohey pers. comm), **NPWS advised that repair works could proceed however no verifiable evidence was provided to confirm this instruction.** (c) Not triggered during the audit period. (d) Noted **Opportunity for Improvement: It is recommended that, in future instances where stakeholder involvement is required, Transgrid follows up on any agreed actions via email to ensure a clear and documented communication trail.**	
DEMOLITION					
A10.	The Proponent must ensure that all demolition work on site is carried out in accordance with *AS 2601-2001: The Demolition of Structures* (Standards Australia, 2001), or its latest version.		Compliant	No demolition works have been undertaken during the audit period (B. Toohey pers. comm).	
STRUCTURAL ADEQUACY					
A11.	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA; and where the BCA is not applicable, to the relevant Australian Standard. *Notes:* • *Under Part 6 of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.* • *The EP&A Regulation sets out the requirements for the certification of the development.*	HV Steel Erection Inspection and Test Plan dated 18/12/2024	Compliant	During the audit period the construction of buildings and structures that form part of the development included 18 gantries and an Auxiliary Switch Room. All gantries are located within the Margle Switchyard Project Area as well as the Auxiliary Switch Room. It should be noted the Auxiliary Switch Room is situated onsite but it was still undergoing construction at the time of the audit, therefore no building certificate could be provided. The Inspection Test Plans for the gantries were sighted. No other buildings or structures that form part of the development were constructed during the audit period (J. Snape pers. comm).	

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COMPLIANCE					
A12.	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.	UGL Induction Record Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction Presentation dated 30/09/2024 Clearing and Grubbing Environmental Work Statement (rev 7) dated 17/02/2025 Environmental refresher and CEMP Toolbox attendance register dated 22 February 2025	Compliant	Identified in previous Construction Audits, Transgrid continue to ensure all employees and contractors inducted on site review the UGL Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction (sighted). The induction (revised during this audit period) covers Environmental Information and Compliance relevant to the conditions of this approval and is highlighted in Part 2 of the presentation. A copy of the employee induction was sighted on 11 March 2025. Consistent with previous Construction Audits, relevant mitigation measures are continued to be included in Environmental Method Statements (sighted) with toolboxes (sighted) also being held to increase environmental awareness for employees to ensure individuals are aware of their obligations related to their activities and the development.	
OPERATION OF PLANT AND EQUIPMENT					
A13.	All plant and equipment used on site, or in connection with the development must be: (a) maintained in a proper and efficient condition; (b) operated in a proper and efficient manner; and (c) kept free of weeds, seeds and pathogens when entering or leaving the site.	Lobs Hole Daily Checklist Pre-Start Excavator dated 17/02/2025 Service Register (Plant and Vehicle) dated 01/03/2025 Plant Daily Inspection – Moxy dated 6/11/2024 Weed and Pathogen Declaration Record – Toyota Hilux (Light Vehicle) dated 8/10/2024 Weed and Pathogen Declaration Record – Moxy Water Cart dated 11/03/2025	Compliant	(a)/(b) All plant and equipment observed onsite appear to be well maintained and operated in a proper and efficient manner. A sample of services records and vehicle histories were sighted during the audit. (c) All plant onsite is accompanied by a Weed And Pathogen Hygiene Declaration Record providing evidence that the plant has been cleaned and inspected ensuring it has been kept free of weeds, seeds and pathogens. Between September 2024 and March 2025, a total of 102 declarations have been received (J. Snape pers. comm). A completed Weed and Pathogen Declaration Record for a Water Cart dated 11 March 2025 and a Toyota Hilux dated 8 October 2024 was sighted during the audit. During the site audit inspection, wheel wash facilities were observed to be installed at both the East (Lobs Hole) and West (Maragle) Project Areas to ensure vehicles and plant equipment are appropriately cleaned upon entering and exiting the site. The Maragle Construction Compound also had gravel surfacing and rumble grids installed at access points to assist in minimising mud tracking. However, **during a 20-minute observation period at the Maragle Compound, two trucks were observed entering and exiting the site without using the wheel wash facility. Additionally, one of these trucks was observed entering and leaving the site without its load being adequately covered**. **Opportunity for Improvement**: **It is recommended that all contractors and personnel be reminded of the requirement to use site wheel wash facilities where installed and applicable, and to ensure vehicles arrive and depart the site clean and free of soil, weeds, seeds, and pathogens. This could be reinforced through regular toolbox talks and the installation of clear signage at site exit points.**	
APPLICABILITY OF GUIDELINES					
A14.	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		
A15.	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.		Not triggered	No requests or directions from the Planning Secretary were received in respect of ongoing monitoring and management obligations during the audit period (J. Snape pers. comm).	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
PART B ENVIRONMENTAL CONDITIONS – GENERAL					
NOISE AND VIBRATION					
Construction Hours					
B1.	Unless the Planning Secretary agrees otherwise, road upgrades, construction, upgrading and decommissioning activities may only be undertaken between 6 am to 6 pm.	Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction Presentation dated 30/09/2024	Compliant	Construction activities have only been undertaken during nominated construction hours (B. Toohey pers comm). Nominated hours for road upgrades, construction, upgrading and decommissioning activities are detailed in Part 2 of the UGL Induction Presentation. No out-of-hours works permits have been issued during the audit period (B. Toohey pers. comm).	
B2.	The following construction, upgrading and decommissioning activities may be carried out outside the hours specified in condition B1 above: (a) the delivery or dispatch of materials as requested by the NSW Police Force or other public authorities for safety reasons; or (b) emergency work to avoid the loss of life, property or to prevent material harm to the environment; or (c) activities that are inaudible at sensitive receivers that do not require traffic movements on local roads; or (d) road upgrades required by the relevant roads authority/manager to be undertaken outside the construction hours specified in condition B1; or (e) works carried out in accordance with an Out-of-Hours Work Protocol approved in accordance with condition B3.		Not triggered	No works have been carried outside nominated construction hours during the audit period (J. Snape and B. Toohey pers. comm).	
B3.	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of works which are outside the hours defined in condition B1. The Protocol must be approved by the Planning Secretary before commencing these works. The Protocol must: (a) be prepared in consultation with Council; (b) provide a process for the consideration of out-of-hours works against the relevant construction noise, traffic noise and vibration criteria, including the determination of low and high risk activities; (c) identify an approval process that considers the risk of activities, proposed mitigation, management, and coordination, (d) identify Department and Council arrangements for approved out of hours work.	Noise and Vibration Management Plan (rev 0.07) dated 24/10/2024 DPHI Noise and Vibration Management Plan Approval Letter dated 11/02/2025 DPHI Noise and Vibration Management Plan Approval Letter dated 25/10/2024	Compliant	Confirmed during previous Construction Audits, an Out-of-Hours Work Protocol has been prepared by Transgrid for the development. The Out of Work Protocol addresses the requirements of Condition B3. In Construction Audit 2, it was noted the revised Noise and Vibration Management Plan (NVMP) (rev.0.06) which incorporates the Out of Works Protocol was pending approval from the Planning Secretary. The revised NVMP was approved during this audit period on the 25 October 2024. An additional revision (rev.0.07) was submitted to the Planning Secretary incorporating the inclusions of Stage 2 Works. This revision was approved on the 11 February 2025.	
Construction and Decommissioning					
B4.	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.	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.19) dated 13/08/2024 Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024 Complaints Register	Compliant	All works undertaken during the audit period have been related to construction activities including clearing and civil works. All construction related activities were restricted to nominated construction hours (B. Toohey pers. comm). Noise mitigation measures are addressed in the NVMP (rev 0.07) and the Traffic and Transport Management Plan (rev 0.19) (TTMP). Mitigation measures undertaken onsite include limiting machine/vehicle idling and maintenance of equipment (B. Toohey pers. comm). No complaints have been received during the audit period (B. Toohey pers. comm**).**	
B5.	The Proponent must implement mitigation measures with the aim of achieving the road traffic noise assessment criteria for land uses from NSW Road Noise Policy (DECCW, 2011).	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.19) Appendix K Driver Code Of Conduct For Maragle Project dated 13/08/2024	Compliant	Confirmed during previous Construction Audits, the Drivers Code Of Conduct For Maragle Project (sighted) includes measures to reduce noise with the aim of achieving the road traffic noise assessment criteria for land uses from NSW Road Noise Policy (DECCW, 2011). The Code of Conduct is included as Appendix K of the TTMP. During the site audit inspection, evidence of mitigation measures being implemented was observed, specifically that vehicles were turned off when not in use, preventing unnecessary idling.	

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AIR QUALITY					
B6.	In addition to the performance outcomes, commitments and mitigation measures specified in the EIS, the Proponent must take all reasonable steps to: (a) minimise the off-site dust, fume, blast emissions and other air pollutants of the development; and (b) minimise the surface disturbance of the site.	Soil and Water Management Plan (rev 0.10) Appendix H Contaminated Land Management Plan (rev 0.09) dated 5/08/2024 A3L Drone Clearing Imagery dated 21/03/2025	Compliant	Consistent with previous Construction Audits, the development continues to implement a range of mitigation measures aimed at reducing offsite pollutants and minimising surface disturbance. Relevant mitigation measures are all outlined in respective management plans including the Contaminated Land Management Plan (rev.09) and Soil and Water Management Plan (rev 0.10) (SWMP). (a) Mitigation measures to reduce off-site dust and air pollutants include using water carts across the development area and applying mulch in inactive areas where ground disturbance has occurred. During the site audit inspection, water carts were observed in operation across Project East and West. (b) Consistent with Construction Audit 2, the development continues to implement the UGL Clearing Tracking Methodology Statement, which outlines how UGL minimises disturbance within the approved disturbance footprint. Transgrid is also continuously reviewing and refining the disturbance footprint around cleared areas of pads to further minimise environmental impact. A strong emphasis is placed on reducing total cleared areas and prioritising partial clearing where feasible (J. Snape pers. comm). This approach has led to significant reductions in total clearing, with an estimated decrease of 11 ha. Transgrid and UGL have confirmed that, in line with commitments outlined in the EIS and management plans, they continue to explore opportunities to revise the disturbance footprint to further reduce surface disturbance (J. Snape pers. comm).	
SOIL AND WATER					
Permanent Spoil Emplacement Areas					
B7.	Apart from the spoil that is provided to the NPWS for use in other parts of the Kosciuszko National Park, Forestry Corporation for use in other parts of State Forest, sent off-site, used to construct temporary or permanent infrastructure for the development or Snowy 2.0 Main Works (in accordance with that infrastructure approval, or used to rehabilitate the site or the Snowy 2.0 Main Works site, the Proponent must ensure that any spoil disposed within Kosciuszko National Park are emplaced in the following emplacement areas: (a) Ravine Bay; or (b) GF01; or (c) Lobs Hole; or (d) Tantangara for spoil containing naturally occurring asbestos only. *Note: The location of these emplacement areas is shown in the figures in Appendix 2.*	Spoil Movement and Placement Permit Register Spoil Movement and Placement Permit SMP-016 dated 24/02/2025 Spoil Movement and Placement Permit SMP-009 dated 24/10/2024 CEMP Appendix G of the CEMP Aspects and Impacts Register (rev. D) 2024 2025 Spoil Movement to Leeds Register	Compliant	During the audit period, a total of 90,703.56 tonnes of spoil originating from Project West (Maragle) has been relocated and 191, 290 tonnes of spoil was transported to the Leeds Stockpile on the Project East (Lobs Hole) during the audit period. All spoil transported during the audit period has been utilised either to support the construction of temporary or permanent infrastructure for the development (Permit SMP-016 sighted) or has been transported to the Main Works Temporary Stockpile (Lobs Hole Emplacement Area) (Permit SMP-009 sighted). **Opportunity for Improvement: It is recommended that the spoil register be regularly maintained and updated to accurately record ongoing spoil movements, with updates occurring at intervals no greater than one month.**	

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Spoil Management Plan					
B8.	Prior to the commencement of construction, the Proponent must prepare a Spoil Management Plan to the satisfaction of the Planning Secretary for the development. This plan must: (a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, FCNSW, EPA, Water Group, NRAR and DPI; (b) include a description of the measures that would be implemented to: i) minimise the spoil generated by the development; ii) maximise the reuse of non-reactive spoil on site and in other parts of the Kosciuszko National Park, Bago State Forest and/or offsite; iii) minimise the water quality impacts of the temporary spoil stockpiles; (c) provide an overarching framework for the management of all spoil generated on site, including the testing, classification, handling, temporary storage, chain of custody and disposal of spoil – that complies with the spoil management requirements in condition B7 above; (d) include a detailed plan for managing the temporary spoil stockpiles of the development, which includes suitable triggers for remedial measures (if necessary) and describes the contingency measures that would be implemented to address any water quality risks; (e) investigating, assessing and managing contaminated land and soils in the development area; (f) investigation, assessing and managing the potential for naturally occurring asbestos, potentially acid forming material and other hazardous materials in the development area; (g) include a detailed plan for managing and the disposal of all the reactive or contaminated spoil generated on site, including the contingency measures that would be implemented if the volumes of this spoil are greater than expected and unsuitable for land disposal; (h) include a program to monitor and publicly report on: i) the management of spoil on site; ii) progress against the detailed completion criteria and performance indicators. Following the Planning Secretary's approval, the Proponent must implement the approved Spoil Management Plan.	Soil And Water Management Plan (rev 0.10) dated 24/10/2024 Soil And Water Management Plan (Rev 0.10) Appendix A Spoil Management Plan (Rev 0.08) dated 05/11/2024 Soil And Water Management Plan (Rev 0.10) Appendix H Contaminated Land Management Plan (rev 0.09) dated 05/11/2024 DPHI Soil and Water Management Plan Approval Letter dated 11/02/2025	Compliant	Confirmed during the Initial Construction Audit, a Spoil Management Plan has been prepared and approved for the development. The Spoil Management Plan addresses all requirements outlined by Condition B8. During the audit period, the Spoil Management Plan (rev.0.10) has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the Spoil Management Plan was not required to be submitted for consultation as updates were minor in nature. The revised Spoil Management Plan (rev.010) which forms part of the SWMP was approved by the Planning Secretary on the 11 February 2025. In Construction Audit 2, it was noted the Spoil Management Plan was undergoing consultation regarding updates in relation to recommendations outlined in the Initial Construction Audit. Transgrid has advised consultation is still ongoing and this would be subject to a subsequent approval (J. Snape pers. comm). During the audit period, it was observed no spoil results have been publicly reported. Transgrid has stated that the results will be published during the next audit period as part of an Annual Review, which will be made publicly available on the project website (J. Snape pers. comm).	
Water Supply					
B9.	The Proponent must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply. *Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Proponent is required to obtain the necessary water licences for the development.*	Completed New Water Access Licence with zero Licence shares application form dated 29/01/2025	Compliant	Confirmed and consistent with previous Construction Audits, the development holds two water access licences (WAL) which include: • WAL44782. • WAL44788. In response to an issue encountered with WAL 44782 in Construction Audit 2, the development is seeking to obtain a new WAL with a water allocation. An application was submitted (sighted) in January 2025 during this audit period. Approval was still pending at the time of the audit.	

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Erosion and Sedimentation					
B10.	The Proponent must: (a) minimise erosion and control sediment generation; (b) take all reasonable and feasible measures to prevent a discharge to waters. This may include, but need not be limited to: i) adopt enhanced erosion and sediment controls, taking into consideration the best available information from the Snowy 2.0 Main Works project; ii) minimising the volume of dirty water generated onsite; and iii) exploring and implementing beneficial reuse opportunities such as irrigation and dust suppression.	Soil And Water Management Plan (Rev 0.10) dated 24/10/2024 PESCP Register Water Irrigation and Disposal Permit (DW_067) dated 07/02/2025 Water Irrigation and Disposal Permit (DW_068) dated 14/02/2025 Track 4 PESCP dated 27/11/2024 Track 5c PESCP dated 2/09/2024	**Non-compliant**	(a) An Erosion and Sediment Control Plan (ESCP) (sighted) has been prepared for the development and is incorporated within the SWMP. The ESCP documents the planned measures to minimise erosion and control sediment generation. Progressive ESCPs have also been prepared to accompany the Primary ESCP. The progressive ESCPs are updated based on changes to site conditions and can take the form of "red line" mark ups of drawings. A register is maintained onsite (sighted) documenting all revisions to progressive ESCPS. (b) i) Confirmed during the Initial Construction Audit. The ESCP's consider best available information from Snowy 2.0 Main Works Project and have been designed to use "better than Blue Book" erosion and sediment controls. Learnings from Snowy 2.0 discussed during the audit include increased size of diversion bunds, early rehabilitation and diverting of water earlier upslope with catch drains rather than relying on sediment basins. During the site audit inspection it was noted that the installed ESC controls on the western side (Maragle) of the development included well installed enhanced erosion controls, including (but not limited to) mulch, soil binder and rock lining covering the majority of exposed surfaces. The installed ESC controls on the western side of the development were observed to be well maintained. Inspection of the works being undertaken on the eastern side (Lobs Hole) of the development highlighted some areas were in need of improvement regarding installed controls, particularly around Track4 and Track 5. It was noted that there were more extensive 'active' work areas and steeper slopes on the eastern side which is located within the Kosciuszko National Park. Active works included installation of access tracks and tower pads on the north western side of Sheep Station Creek specifically Track 5A, Track 5-T8R Track 5 b and Track 4. Review of the Progressive ESCPs for the Eastern Section indicate that proposed controls should primarily consist of stabilised or lined diversion bunds and/or mulch bunds on either side of the tracks being installed, with runoff diverted to regular sediment traps with rock filter dams to be placed at the discharge point. **During the inspection it was observed that some of the installed sediment traps had been sprayed with soil binder however the outlets did not have rock filter dams placed at the discharge point as committed to in the Progressive ESCP. The Progressive ESCP indicates that bunds will incorporate returns with regular "lined spillway weirs", however very few of these were observed to be installed on some of the tracks in the Eastern Section. Some had been installed and sprayed with soil binder but not lined (as indicated in the Progressive ESCP drawings).** ii) Confirmed during previous Construction Audits minimising dirty water is outlined in the SWMP. No groundwater dewatering has occurred during the audit period (B. Toohey pers. comm). One sediment basin located at the base of Track 8 has been installed during the audit period, which makes two sediment basins currently in operation onsite. No discharges from either basin have occurred during the audit period (J. Snape pers. comm). Staged clearing is occurring to minimise the amount of "open" catchment available to generate dirty water runoff. Clean water diversion catch drains are being installed as a priority. Due to staged clearing and bulk earthworks, the catchments are shaped and sizes of controls are evolving to split the catchments up further to minimise the volume of dirty water being generated on site. iii) Confirmed during previous Construction Audits water reuse is detailed in the SWMP. During this audit period no additional opportunities have been explored. Any water captured in the on-site sediment controls is used for dust suppression via watercart as required and irrigation back onto the site. A water irrigation and disposal permit system is in place (sighted) to detail the required control measures during irrigation of water around the site. It is noted irrigation is only applicable in total clear zones and not to be used in areas identified as partial clearing zones (J. Snape pers comm). **Recommendation: It is recommended that the installed ESCs and Progressive ESCP in the Eastern Section of the development, particularly from Track 4 to Track 5, are reviewed to ensure installed controls are compliant with the Progressive ESCP. In particular, focus should be given to ensuring that bunds include regular returns with regular lined spillway weird and that the outlets of sediment traps have rock filter dams placed at the discharge points as per the Progressive ESCP.**	**NC-02**

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Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Pollution of Waters					
B11.	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.	Major Projects Notification - Track 8 Turbid Water Discharge (rev 1) dated 19/10/2024 Major Projects Notification - Track 8 Turbid Water Discharge (rev 3) dated 1/12/2024 Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 28/12/2024 Major Projects Notification - Track 5 and Track 8 Turbid Water Discharge 5-7 December 2024 (rev 2) dated 19/10/2024 Major Projects Notification - Track 2 Turbid Water Discharge dated 8/12/2024 Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 8/12/2024 Major Projects Notification - Track 8 Turbid Water Discharge dated 11/01/2025 Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 11/01/2025 Major Projects Notification - Maragle Switchyard Turbid Water Discharge dated 11/01/2025 Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 11/01/2025	**Non-compliant**	During the audit period six incidents were reported involving the discharge of turbid water. An overview of the incidents is provided below: • ***October Track 8 Turbid Water*:** A heavy rainfall event of approximately of 45.4 mm affected the development area on 18 October 2024. During the rain event, approximately at 4:00pm, a heavy downpour of 9.6 mm in 15 minutes was received, overwhelming the ESC along Track 8. This caused **turbid water to flow into the roadside drain on Mine Trail Road towards Wallaces Creek.** Water quality sampling was undertaken upstream and downstream of the landslip within the clean water drain as well as the EPL reference and impact site of Wallaces Creek. Water quality sampling confirmed that turbidity levels at both the impact and reference sites in Wallaces Creek were similar, indicating no significant impact on the creek's water quality. • ***November Track 5 and Track 8 Turbid Water:*** A heavy rainfall event of approximately 80.8 mm affected the development area (East) over the period of 27-29 November 2024 within a 120 hour, 90th percentile rainfall event. Post-rainfall inspections undertaken between 28 November 2024 and 1 December 2024 noted **turbid water had discharged from Track 5 towards the western side of Sheep Station Creek and Track 8 towards Cave Gully and Yarrangobilly River within the development area**. Water quality sampling was undertaken at Sheep Station Creek, Cave Gully and Yarrangobilly River with results indicating elevated turbidity levels. • ***December Track 5 and Track 8 Turbid Water:*** Approximately 85.4 mm of rainfall was recorded within development area East over the period of 5-7 December 2024 within a 120 hour, 90th percentile rainfall event. Post-rainfall inspections on 5, 6 and 7 December 2024 indicated **turbid water had discharged from Track 5 towards the western side of Sheep Station Creek and Track 8 towards Cave Gully and Yarrangobilly River within the development area**. Water quality sampling was undertaken at Sheep Station Creek, Cave Gully and Yarrangobilly River with results indicating elevated turbidity levels. • **Track 2 and Tower Pad 1R/2R-12 Turbid Water**: Approximately 55.6 mm of rainfall was recorded within development area (West) over the period of 6-7 December 2024 within a 120 hour, 90th percentile rainfall event. Post-rainfall inspections on 8 December 2024 indicated **turbid water had discharged from Track 2 and Tower Pad 1R/2R-12 beyond the development area boundary**. No water was sampled during this event. • **Track 8 Turbid Water**: Approximately 11.2 mm of rainfall was recorded within Project Area East on 11 January 2025. Post-rainfall inspections indicated **turbid water had discharged from Track 8 towards Wallaces Creek within the development area**. Water quality sampling was undertaken at Sheep Station Creek, Cave Gully and Yarrangobilly River with results indicating elevated turbidity levels. • **Maragle Switchyard Turbid Water**: A severe storm impacted the development area (West) on the 15 January 2025 resulting in approximately 26.2 mm of rainfall. The storm event lasted approximately 30 minutes with a peak rainfall intensity of 228.6 mm/hour and wind gusts exceeding 100 km/h. Post-rainfall inspections undertaken on the 15 January 2025 following the storm event indicated **turbid water had discharged into the "V" drain along an access track immediately adjacent to the Maragle Switchyard towards New Zealand Gully within the development area**. Water quality sampling was undertaken at New Zealand Gully with results indicating elevated turbidity levels. All incidents were reported to relevant agencies as required with further details provided in Condition C7 of this Infrastructure Approval Table.	**NC-03**

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
B12.	The Proponent must: (a) ensure that appropriate components of the substation are suitably bunded; (b) ensure that all liquid waste captured by the substation's spill oil containment system is classified, transported, and disposed of at a facility that can lawfully accept the waste; and (c) minimise any spills of hazardous materials or hydrocarbons and clean up any spills as soon as possible after they occur.	Soil And Water Management Plan (rev 0.10) Appendix B Spill Response Procedure (rev 10)	Compliant	(a) The construction of the substation has not commenced during the audit period (J. Snape pers. comm). (b) Not triggered. (c) During the site audit inspection hazardous materials/hydrocarbons were observed to be stored within a bunded storage containers and designated areas. Drip trays utilised for refuelling were also observed to be in use. During the audit period no incidents regarding hydrocarbon spills were reported (B. Toohey pers. comm).	
B13.	The Proponent must ensure that any groundwater dewatering activities do not discharge to watercourses.		Not triggered	No groundwater dewatering has been undertaken onsite during the audit period (B. Toohey pers. comm)**.**	
Riparian Areas					
B14.	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 DPE Water agrees otherwise; and (b) the geomorphic condition of the major rivers and distributary channels crossed by the development is not impacted.		Compliant	(a) Confirmed during Construction Audit 2, the Sheep Station Creek Bridge design is compliant with Condition B14, including complying with relevant requirements of the Guidelines for Controlled Activities on Waterfront Land (2012). During the audit period, construction activities utilised the temporary bridge across Sheep Station Creek for access to undertake construction activities on Track 5a, Track 5b, Track 5c and Track 4 on Project West (B. Toohey pers. comm). The final permanent bridge for Sheep Station Creek had not been constructed during the audit period. (b) Confirmed during Construction Audit 2, the SLR Snowy 2.0 Sheep Station Creek Bridge Crossing Report concluded that, provided appropriate erosion and sediment controls are maintained throughout construction works, it is unlikely that the geomorphic condition of Sheep Station Creek will be affected by the construction from either the permanent or temporary bridge. Observations during the site audit inspection noted that appropriate erosion and sediment controls were installed surrounding the temporary Sheep Station Creek Bridge. The temporary bridge includes a lip along the edges of the bridge and geofabric slung underneath the bridge deck to catch sediment. However, some **sediment was observed accumulating on the temporary bridge deck within the lip and was likely being washed over the sides during rain events**. This was evident through the presence of sediment on beams underneath the bridge and sediment on the geofabric slung underneath the bridge deck. **Opportunity for Improvement: It is recommended to prevent ingress of sediment into Sheep Station Creek from the temporary bridge deck, sandbags or similar (where safety permits) are installed along the outermost edges of the temporary bridge deck to prevent sediment being washed into the creek or more frequent removal of sediment on the bridge deck is undertaken to reduce the build-up of sediment on the bridge deck.**	
Flooding					
B15.	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 either FCNSW or NPWS.		Compliant	Confirmed during Construction Audit 2, the proposed bridges (temporary and permanent) will not significantly impact flood conditions within Sheep Station Creek for a 1% AEP Flood Event. Works occurring during this audit period located within potentially flood affected areas included works relating to the construction of the permanent Sheep Station Creek Bridge. During the site audit inspection it was **unclear if ESC were installed above the 2-year [Average Recurrence Interval] ARI flood to prevent impacts from concentrated water flows** as required by Section 5.3.2 (c) of Managing Urban Stormwater (the Blue Book) (Landcom, 2004). **Opportunity for Improvement: It is recommended that a survey of the installed ESCs around Sheep Station Creek should be undertaken to validate that installed controls (notably installed sediment fences) lie outside of the 2-year ARI (where practical) to minimise potential impacts from concentrated water flows (i.e. loss of materials and pollution of waterways during flood events).**	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Water Management Plan					
B16.	Prior to the commencement of construction, the Proponent must prepare a Water Management Plan for the development to the satisfaction of the Planning Secretary. This sub-plan must: (a) be prepared by a suitably qualified and experienced person in consultation with the EPA, FCNSW, NPWS, the Water Group and NSW DPI; (b) include provisions for: i) detailed baseline data on surface water flows and quality in the watercourses that could be affected by the development, and a program to augment this baseline data over time; ii) detailed criteria for determining surface water impacts of the development (flows, quality and flooding), including criteria for triggering remedial action (if necessary); and iii) a description of the measures that would be implemented to minimise the surface water impacts of the development and comply with the relevant water management requirements in conditions B10 to B15 are complied with; and (c) managing flood risk during construction. Following the Planning Secretary's approval, the Proponent must implement the Water Management Plan.	Soil And Water Management Plan (rev 0.10) dated 24/10/2024 DPHI Soil and Water Management Plan Approval Letter dated 11/02/2025 Monthly water quality monitoring reports for October 2024 through to January 2025	Compliant	Confirmed during the Initial Construction Audit, a Water Management Plan (referred to as the SWMP) has been prepared and approved for the development. The SWMP addresses all requirements outlined by Condition B16. During this audit period, the SWMP (rev. 0.10) has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the SWMP was not required to be submitted for consultation as updates were minor in nature. The SWMP (rev. 0.10) was approved by the Planning Secretary on the 11 February 2025. In Construction Audit 2 it was noted the SWMP was undergoing consultation regarding updates in relation to recommendations outlined in the Initial Construction Audit. Transgrid has advised consultation is still ongoing and this would be subject to a subsequent approval. Evidence of implementation of the Water Management Plan was observed during the site audit inspection, management measures included (but were not limited to): • Installation of appropriate ESC controls as per the PESCPs across the majority of the site. Refer to Condition B10 for notes regarding areas where ESC controls have not been installed as per the PESCPs. PESCP register updated regularly. • Presence of spill kits at various locations across the site. • Installation of appropriate bunds for plant and vehicle washdown. • Bunded chemical storage containers. • Evidence of site training including posters and notes displayed in Crib Sheds relating to ESC measures. • Monthly water quality monitoring was undertaken during the audit period. Monthly Monitoring Reports were sighted for all months except February, which was in preparation at the time of the audit. A review of the available reports identified exceedances of various water quality parameters at multiple locations and timeframes across the project site. However, the reports to date have not identified any exceedances as being attributable to construction activities associated with the development. It was noted that in the main body of the water quality monitoring reports, pH results were only compared against a single Site-Specific Guideline Value (SSGV) per watercourse, rather than against a defined minimum and maximum range, as is typically expected for pH assessments. This is important, as aquatic ecosystem health can be adversely affected by both low and high pH values. While this limitation is present in the summary graphs, it is acknowledged that the full table of results presented in Appendix C of the monitoring reports does provide a comparison against the pH range. **Opportunity for Improvement: It is recommended that an upper and lower range SSGV should be graphed in the main body of the Monthly Monitoring Reports to allow for easy assessment of the impacts of the development on pH.**	

<table>
<tr><th colspan="5">Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1</th></tr>
<tr><th>Condition No.</th><th>Requirement</th><th>Evidence Collected</th><th>Compliance Status</th><th>Independent Audit Findings and Recommendations</th><th>Unique ID on NC</th></tr>
<tr><td colspan="5">BIODIVERSITY</td><td></td></tr>
<tr><td colspan="5">Restrictions on Clearing and Habitat</td><td></td></tr>
<tr><td>B17.</td><td>Unless otherwise agreed with the Planning Secretary, the Proponent must:
(a) ensure that no more than:
i) 9.35 ha of Caladenia montana species habitat
ii) 89.06 ha of Gang-gang Cockatoo (breeding) species habitat
iii) 10.86 ha of Masked Owl (breeding) species habitat
iv) 117.29 ha of Eastern Pygmy-possum species habitat
v) 59.03 ha of Yellow-bellied Glider species habitat; and
vi) 1.67 ha of Booroolong Frog species habitat
vii) is cleared for the development; and
(b) minimise:
i) the impacts of the development on hollow-bearing trees;
ii) the impacts of the development on threatened species; and
iii) the clearing of native vegetation and key habitat.</td><td>Biodiversity Management Plan (rev 0.13) dated 30/10/2024
UGL Clearing Tracking Methodology statement
UGL Clearing Progress Summary dated 21/03/2025
Snowy 2.0 Transmission Connection Project Drone Imagery current to 13 March 2025
Fauna Habitat / Salvage Relocation (E-08) dated 0/02/2025</td><td>Compliant</td><td>Consistent with previous Construction Audits, the development continues to operate under a staged clearing permit system to ensure clearing is undertaken within the specified limits which includes reviewing clearing tracking data captures through use of surveyor and georeferenced drone imagery (sighted).
(a) No clearance was reported as occurring outside approved limits during this reporting period (B. Toohey pers. comm). Extent of clearing reported by UGL has been summarised in the table below in Table A2.
Table A2 Habitat Clearing Extent
<table>
<tr><th>Species</th><th>Extent of Clearing at end of Audit Period (ha)</th><th>Clearing Limit (ha)</th></tr>
<tr><td>Caladenia montana</td><td>7.23^</td><td>9.35</td></tr>
<tr><td>Gang-gang Cockatoo</td><td>78.56</td><td>89.06</td></tr>
<tr><td>Masked Owl</td><td>10.2</td><td>10.86</td></tr>
<tr><td>Eastern Pygmy-possum</td><td>95.30</td><td>117.29</td></tr>
<tr><td>Yellow-bellied Glider</td><td>54.19</td><td>59.03</td></tr>
<tr><td>Booroolong Frog</td><td>0.93</td><td>1.67</td></tr>
</table>
It is noted that clearing of Caladenia montana has occurred during the audit period outside the species polygons identified in the BDAR. EMM has been engaged to evaluate the field-verified records of Caladenia montana located outside these mapped polygons to determine whether the development has resulted in impacts exceeding the approved 9.35 ha of habitat (J. Snape pers. comm). The outcome of this assessment will be subject to review during the next audit.
(b) Measures to minimise impacts to threatened species were observed during the site audit inspection. Measures include the demarcation of exclusion zones and the retention of limb-removed hollow bearing trees which were located within the outer edges of the approved clearing area (sighted).</td><td></td></tr>
<tr><td colspan="5">Biodiversity Offset Package</td><td></td></tr>
<tr><td>B18.</td><td>Prior to carrying out any development that would impact on biodiversity values outside Kosciuszko National Park, the Proponent must prepare a Biodiversity Offset Package (Package) that is consistent with the EIS, in consultation with BCS and BCT, to the satisfaction of the Planning 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 measures, which would be required to be paid into the Biodiversity Conservation Fund if the relevant measures is not implemented and delivered (as calculated in accordance with Division 6 of the Biodiversity Conservation Act 2016 (NSW)) and the offset payment calculator that was established as of 9 August 2021;
(c) the timing and responsibilities for the implementation and delivery of measures required in the Package; and
(d) confirmation that the biodiversity offset measures will have been implemented and delivered by no later than 1 September ~~2024~~ 2025.
Following approval, the Proponent must implement and deliver the Biodiversity Offset Package.</td><td>Snowy Hydro Re: B18, B19 & B20 Biodiversity Offset Package Team Binder Correspondence dated 04/12/2024</td><td>Compliant</td><td>Confirmed during the Initial Construction Audit, a Biodiversity Offset Package (BOP) has been prepared and approved for the development. The BOP addresses all requirements of this condition.
The BOP is required to be delivered by September 2025 (date revised from 1 September 2024 by MOD 1).
As outlined in Construction Audit 2, consultation was ongoing in response to a recommendation from the Initial Construction Audit requesting additional details on the cost calculations for each biodiversity offset measure. This process has continued through this audit period and remains unresolved. Efforts to address the recommendation are ongoing, with further consultation with Snowy Hydro required to finalise the recommendation. The matter is ongoing (J. Snape pers. comm).</td><td></td></tr>
</table>

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
B19.	Prior to carrying out any development outside of the Kosciuszko National Park that could impact the biodiversity values requiring offset, the Proponent or its nominee must lodge a bank guarantee with a total value of $24,869,236, in accordance with the Deed of Agreement with the Planning Secretary executed on 1 September 2022. The Proponent must comply with the terms of the Deed. *Note: this condition provides security to the Minister for the performance of the Proponent's obligations under this approval in relation to biodiversity offsets and release funds for payment into the Biodiversity Conservation Trust in the event that the biodiversity offsets (either in whole or part) are not delivered in accordance with the Package by the Proponent.*		Compliant	Confirmed during the Initial Construction Audit a bank guarantee in the amount of $24,869,236.00 relating to biodiversity offsets had been paid.	
Biodiversity Offset Package (Kosciuszko National Park)					
B20.	Prior to carrying out any development that could impact the biodiversity values inside Kosciuszko National Park, the Proponent or its nominee must pay $10,586,027 to the NPWS to offset the residual biodiversity impacts. Notes: • The NPWS will use these funds and any interest generated by these funds to enhance the biodiversity values of the Kosciuszko National Park. However, in limited circumstances where it is not possible to address all of the residual impacts of the development within Kosciuszko National Park, the NPWS may use some of these funds to ensure suitable conservation actions are carried outside the park. • To ensure accountability, the NPWS will: o develop and implement a detailed program for the allocation of these funds to specific projects, focusing on the ecosystems and species affected by the development; and o monitor, evaluate and publicly report on the progress of the implementation of the detailed program and the effectiveness of the specific projects; • The NPWS will develop and implement a specific program in consultation with DCCEW and BCS to carry out conservation actions to address the residual biodiversity impacts of the development on the following Commonwealth listed species and communities: o Booroolong Frog.		Compliant	Confirmed during the Initial Construction Audit a payment of $10,586,027.00 to NPWS had been paid.	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Biodiversity Management Plan					
B21.	Prior to carrying out any development that could impact biodiversity values, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced biodiversity expert/s in consultation with NPWS, BCS, FCNSW and DCCEEW; (b) be prepared in accordance with the Biodiversity Development Assessment Report (Revision 7, dated 22 August 2022); (c) include a description of the measures that would be implemented to: i) ensure the development does not adversely affect the native vegetation and habitat outside the disturbance footprint; ii) minimise the clearing of native vegetation and habitat within the disturbance area; iii) minimise the impacts of the development on threatened flora and fauna species within the disturbance area and its surrounds, including the: • *Caladenia montana*; • Gang-gang Cockatoo; • Masked Owl; • Eastern Pygmy-possum; • Yellow-belied Glider; and • Booroolong Frog iv) minimise the potential indirect impacts on threatened flora and fauna species, migratory species and 'at risk' species; v) minimise potential fauna strike in sensitive habitat areas on the road network within the site, including reducing speed limits between sunset and sunrise; vi) minimise the impacts on fauna on site, including undertaking pre-clearance surveys; vii) protect native vegetation and key fauna habitat outside the approved disturbance area; viii) monitor 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; ix) maximise the salvage of resources within the disturbance area for reuse in the restoration of vegetation and habitat on site, including native vegetative material, hollow logs, ground timber, and topsoil containing vegetative matter and native seed bank; x) collect seeds within the approved disturbance area for use in the ecological rehabilitation of the site; xi) minimise the spread of weeds, pathogens and feral pests on site, and import or export of these matters to or from the site; xii) minimise the generation and dispersion of sediment to watercourses, particularly the Sheep Station Creek, Lick Hole Gully, Cave Gully, Wallaces Creek and Yarrangobilly River; xiii) minimise the light spill from night works, including using directional and LED lighting; and xiv) minimise bushfire risk. (d) include construction clearing and operation vegetation management protocols	Biodiversity Management Plan (Rev 0.13) dated 30/10/2024 DPHI BMP Approval Letter dated 14/02/2025 24hr Preclearing Checklist - E06, East ▸ West of Sheep Station Creek ▸ T10 to T11 dated 17/03/2025 24hr Preclearing Checklist – E04 dated 17/03/2025 24hr Preclearing Checklist – E08 dated 3/17/2025 24hr Preclearing Checklist – E18, East ▸ West of Sheep Station Creek ▸ Access Track 5 from T9 to T10 dated 12/03/2025 24hr Preclearing Checklist – E19, East ▸ West of Sheep Station Creek ▸ Access Track 5 from T9 to T10 dated 12/03/2025 24hr Preclearing Checklist – E05, East ▸ West of Sheep Station Creek ▸ T11 dated 11/03/2025 Fauna Rescue & Event Record (Antechinus - E-05) dated 21/02/2025 Fauna Rescue & Event Record (Antechinus - E-07) dated 09/02/2025 Fauna Rescue & Event Record (Sugar Glider - E-07) dated 09/02/2025 Fauna Rescue & Event Record (Microbat - E-13) dated 09/02/2025 Fauna Rescue & Event Record (Crayfish - E-08) dated 08/02/2025 Pre-construction ecological survey report - Maragle East, Towers 10 and 11 dated 29/11/2024	**Non-compliant**	During the audit period, the BMP has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the BMP was not required to be submitted for consultation as updates were minor in nature. The revised BMP was approved by the Planning Secretary on the 14 February 2025. The BMP addresses all requirements outlined by Condition B21 with exception of the items identified in previous Construction Audits. Changes to the BMP to reflect recommendations in previous audits is still subject to ongoing consultation and subsequent approval by the Secretary (J. Snape pers. comm). It is noted the Operational Vegetation Management Plan has not been prepared during the audit period. During the audit period a request was made to extend the submission timeframe for the preparation of the Operational Vegetation Management Plan was sought. This request was consulted with CPHR and NPWS, both of whom approved the extension. As a result, the submission deadline was extended by four months, with the new due date set for April 4, 2024 and this has been included in the BMP. Evidence of implementation of the BMP was observed during the site audit inspection and thorough review of documentation. **This audit has identified a number of non-compliances with the implementation of the BMP. A detailed compliance review and findings is presented in the BMP Management Measures Compliance Table** (refer **Table 2** in **Appendix 4**).	**NC-04**

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
	(e) include a strategy to address: i) management of activities within the 50 m exclusion zone of the Yarrangobilly River and its tributaries; ii) a trigger action response plan identifying actions to be implemented should any water quality criteria be exceeded focusing on the extent to which exceedances might affect the Booroolong Frog; and (f) include a program to monitor, evaluate and publicly report on the effectiveness of these measures. Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.	Clearing and Grubbing EWMS dated 17/02/2025 Jones Environmental Consulting Asbestos in Soil Analysis - Stockpile Assessment Results dated 30/10/2024 Weed Spraying Register UGL last entry dated 13/02/2025 SLR Pest and Predator Data and Monitoring Report – Quarter 4 dated 26/02/2025			
HERITAGE					
Protection of Heritage Items					
B22.	The Proponent must ensure the development does not cause any direct or indirect impacts on: (a) any Aboriginal heritage items located outside the approved construction envelope (see Appendix 3); and (b) any of the historic heritage items outside the construction envelope (see Appendix 3).	Identifying Lithics A guide for recording stone artefacts in the field! Toolbox dated 07/11/2025	Compliant	It was evident during the site audit inspection the development continues to maintain boundary fencing around specific heritage items/Aboriginal sites which have been demarcated by colour-specific rope and appropriate signage. **However, it was identified that heritage items that have been confirmed as not being items of historical heritage are still mapped and demarcated by colour-specific rope**. Reference to proximal heritage items/Aboriginal sites and procedures are continued to be discussed in toolbox talks (sighted). During the audit period no Aboriginal objects or historical heritage items outside of the approved construction envelope have been impacted (B. Toohey pers. comm). **Opportunity for Improvement: It is recommended the development updates relevant digital mapping and removes colour-specific rope demarcation around relevant areas that have been confirmed to not be heritage items to prevent worker confusion.**	
B23.	Prior to carrying out any activity that could harm heritage items, the Proponent must: (a) salvage and relocate all heritage items identified for salvage and relocation to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010); (b) undertake archival recording, test excavation and/or salvage of the historic items listed in Table 5 and Table 7 of Appendix 3 if these items are to be affected by the development.		Compliant	(a) No known heritage clearance activities were undertaken during the audit period. (b) Confirmed in the Initial Construction Audit archival recordings were only required to be undertaken at sites R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Heritage Management Plan					
B24.	Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 3, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared in consultation with Heritage Council, Heritage NSW, NPWS and Aboriginal Stakeholders; (b) include a description of the measures that would be implemented for: i) protecting the heritage items identified in Table 1 of Appendix 3, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved construction envelope; ii) salvaging and relocating the heritage items identified in condition B23; iii) where impacts cannot be avoided to R56 and R120, details of the proposed archaeological research design and excavation methodology, and findings of the Final Archaeological Excavation Report, in accordance with the relevant Heritage Council guidelines; iv) minimising and managing the impacts of the development on heritage items within the construction envelope, including a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works; v) a contingency plan and reporting procedure if: • heritage items outside the approved construction envelope are damaged; • previously unidentified heritage items are found; or • Aboriginal skeletal material is discovered; vi) 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 vii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (c) include a program to monitor and publicly report on the effectiveness of these measures and any heritage impacts of the development; and (d) include a program to publish; i) any detailed archival records required under the conditions of this approval; and ii) the findings of any excavations and salvage works. Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan.	Heritage Management Plan (rev 0.08) dated 22/11/2024 Maragle Transmission Line Project Heritage Clearance Letter – Maragle East Track 5A to 5C dated Novembre 2024 Maragle Transmission Line Project Historic Unexpected Find Short Report and Significance Assessment dated December 2024 Historic Heritage Unexpected Finds Notification dated 29/11/2024 Cultural Heritage Unexpected Finds Notification dated 12/11/2024 TCP T7 01 ASIR TCP T7 02 ASIR TCP T7 03 ASIR Environmental Inspection Weekly Checklist dated 10/11/24 Environmental Inspection Weekly Checklist dated 24/01/25	Compliant	Confirmed during the Initial Construction Audit, a Heritage Management Plan has been prepared and approved for the development. The Heritage Management Plan addresses all requirements outlined by Condition B24. During the audit period, the Heritage Management Plan (rev 0.08) has been updated to reflect Stage 2 Works. As approved by the Planning Secretary, the Heritage Management Plan was not required to be submitted for consultation as updates were minor in nature. The Heritage Management Plan (rev 0.08) was approved by the Planning Secretary on the 07 February 2025. During the audit period, the following Unexpected Finds were identified during the audit period: <u>Aboriginal Cultural Heritage</u> • Three unexpected Aboriginal heritage finds were identified by representatives from the Tumut Brungle Local Aboriginal Land Council during clearance works on November 6–7, 2024. These finds were located outside the disturbance boundary along Maragle East Track 5A to 5C, within Parcels E20 to E34. However, it is noted that while the Tumut Brungle Local Aboriginal Land Council was present onsite at the time of the finds, **it is understood that not all RAPs listed in Section 3.1 of the Aboriginal Heritage Management Plan were notified of the discoveries and given the opportunity to comment**. Following the relocation of objects, Aboriginal Site Impact Recording (ASIR) forms have been prepared and submitted by Navin Heritage Consultants for sites TCP T7 01 to TCP T7 03,in accordance with the Unexpected Finds Procedure outlined in Appendix C of the Aboriginal Heritage Management Plan. <u>Historical Heritage</u> • An Unexpected Historical Object (Drain Refuse) was identified on 6 November 2024 during machine partial clearing areas carried out in the Track 7 clearance location. Following site inspection, it was determined that Track 7 Historic Drain Refuse contains no archaeological significance, and very limited research potential. It is not a relic as defined under the *NSW Heritage Act 1977* (as amended 2009) and does not meet requirements for listing on the Heritage NSW Heritage Management System. During the audit, HSE Weekly Inspections were reviewed and field inspections confirmed that routine inspections are being undertaken. However, it was unclear whether inspections specifically targeting 'sensitive areas,' as required under Section 7.3 of the Aboriginal Heritage Management Plan (Rev 0.08), were being completed or if records of these targeted inspections were being maintained. **Opportunity for Improvement: It is recommended Transgrid consider consultation regarding all relevant activities pertaining to the management of Aboriginal cultural heritage be undertaken with the twenty-one (21) Registered Aboriginal Parties (RAPs) listed in Section 3.2 of the Aboriginal Heritage Management Plan.** **Opportunity for Improvement: It is recommended that Transgrid provide a summary of unexpected finds identified to date, as well as completed clearance works, and invite all RAPs to a workshop. The purpose of the workshop would be to discuss the cultural heritage finds, review their context in relation to previously identified cultural heritage values, and assess whether the finds align with the current archaeological model. In particular, Elders and identified Knowledge Holders should be engaged to discuss the findings and, where possible, be given the opportunity to visit Aboriginal sites of interest. The outcomes of the workshop and/or site visits may be used to inform potential updates to the existing Heritage Management Plan, where relevant.** **Opportunity for Improvement: It is recommended the Weekly Environmental Checklists template be revised to include inspections of 'sensitive areas' identified in the Aboriginal Heritage Management Plan.**	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
TRAFFIC AND TRANSPORT					
Designated Heavy and Heavy Vehicles Requiring Escort Routes					
B25.	All heavy vehicles requiring escort 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 4, unless the Planning Secretary agrees otherwise. Note: The Proponent is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.19) dated 13/08/2024	Compliant	Confirmed during the Initial Construction Audit, details of heavy vehicles requiring escort and haulage routes are detailed in the TTMP. All heavy vehicles escorted during the audit period only used approved haulage routes (B. Toohey pers. comm).	
B26.	All heavy and light vehicles associated with the development: (a) must travel to and from the site via the Primary Access Route described in the EIS, as identified in the figure in Appendix 4; and (b) may travel to and from the site via the Secondary Access Routes and Water Supply Routes, subject to the requirements in condition B31, to the satisfaction of the relevant roads authority/manager. unless the Planning Secretary agrees otherwise.	Utilities Transmission Line Traffic And Transport Management Plan (Rev 0.19) dated 13/08/2024 Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction Presentation dated 30/09/2024 Delivery Driver Specific Pre-Arrival Safety Flyer Lobs Hole (Eastern Site) Access Protocols dated 14/12/2024 Pre-Arrival Safety Flyer Transgrid Maragle Switching Station & Transmission Line Connection Project dated 30/10/2024	Compliant	Confirmed during the Initial Construction Audit, approved routes are shown in Figure 4 in Appendix A of the TTMP. Direction to only travel only approved roads is outlined in the UGL Site Induction (sighted) and is also included in the Pre-Arrival Safety Flyer (sighted).	
Transport Strategy					
B27.	Prior to commencing construction in Project Area West, the Proponent must prepare a Transport Strategy, in consultation with the relevant roads authority/manager, to the satisfaction of the Planning Secretary, which: (a) identifies the location and type of any necessary road upgrades (including roads, intersections, crossing points, bridges and access points), including consideration of relevant amenity impacts; (b) ensures that any road upgrades comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), unless the relevant road authority agrees otherwise; (c) includes a detailed assessment of potential impacts of any necessary road upgrades (such as heritage and biodiversity impacts), including consideration of appropriate mitigation measures; (d) identifies whether intersections, crossing points and access points would be permanent or temporary; and (e) includes measures or notifying, seeking feedback from and addressing the concerns of impacted residents along the route;	Transport Strategy (Stage 1) dated 7/08/2023 SVC Response to Stage 2 Transport Strategy and TTMP Email Correspondence dated 05/11/2024 TfNSW Response to Stage 2 Transport Strategy and TTMP Email Correspondence dated 21/11/2024	Compliant	Confirmed during the Initial Construction Audit, the Transport Strategy is intended to be prepared in two stages (approved). The Transport Strategy (Stage 1) was reviewed and confirmed during the Initial Construction Audit, addressing all requirements outlined by Condition B27. The Transport Strategy for Stage 2 is required to be completed prior to construction and operation of infrastructure related to the 500 kV component of the substation. At the time of the audit, the Transport Strategy for Stage 2 was with the Department, pending approval (J. Snape pers. comm).	
B28.	Prior to commencing construction in Project Area West, the proponent must implement the road upgrades and the mitigation measures identified in the Transport Strategy in condition B27, to the satisfaction of the relevant roads authority/manager.		Compliant	Confirmed during the Construction Audit 2, road upgrades have been completed to the satisfaction of SVC.	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Road Maintenance					
B29.	The Proponent must: (a) undertake an independent dilapidation survey to assess the: i) existing condition of all local roads on the transport route shown in the figure in Appendix 4 (including local road crossings) prior to construction, upgrading or decommissioning works; and ii) condition of all local roads on the transport route (including local road crossing): • within 1 month of the completion of construction, upgrading or decommissioning works, or within a timeframe agreed to by the relevant roads authority/manager; • on an annual basis during construction, or within a timeframe agreed to by the relevant roads authority/manager; (b) repair (or pay the full costs associated with repairing) any damage to local roads on the transport route (including local road crossings): (c) rehabilitate and/or make good any development related damage: i) identified during the construction and/or decommissioning works if it could endanger road safety, as soon as possible after it is identified but within 7 days at the latest, unless the relevant road authority/manager agrees otherwise; and ii) identified in any dilapidation survey completed after the construction, upgrading or decommissioning works within 2 months of the completion of the survey to the satisfaction of the relevant roads authority/manager.	Project: Maragle Project, Tumbarumba to Old Quarry entrance (Elliot Way), New South Wales Dilapidation Survey Report Streetscape dated June 2024 SVC Road Maintenance Agreement – Execution Version dated 19/12/2023	**Non-compliant**	(a) Confirmed during the Initial Construction Audit, a Dilapidation Report has been prepared encompassing the existing conditions (pre-construction) between Tumbarumba and O`Hares Campground, New South Wales (Tooma Road and Elliot Way) in November 2023. In accordance with the Road Maintenance Agreement – Execution Version between Transgrid and SVC, as per Condition 2.1.2 the dilapidation report is required to be updated every 6 months. **No verifiable evidence was provided to demonstrate that the dilapidation report prepared in June 2024 had been updated every six months, or that any such update was undertaken during the audit period.** (b) No damage to local roads have been caused during the audit period. For details relating to the status of the repairs raised in Construction Audit 2 refer to Condition A9 (b). (c) No rehabilitation of roads has been undertaken during the audit period (B. Toohey pers. comm). **Recommendation: It is recommended Transgrid updates the existing dilapidation report to assess the requirements outlined by Condition B29(a) as per the requirements of the Road Maintenance Agreement.**	**NC-05**
B30.	The Proponent must: (a) restrict development-related vehicle speeds on Lobs Hole Ravine Road, Mine Trail Road and within the site to 30 km/h between sunset and sunrise, unless the Planning Secretary agrees otherwise; (b) restrict the use of Elliott Way inside KNP to no more than 8 heavy vehicles per day, for water cartage purposes only from the Snowy Hydro T2 Tailbay site; (c) restrict development-related vessel speeds on Talbingo Reservoir to current TfNSW speed limits.	Utilities Transmission Line Traffic And Transport Management Plan dated (rev 0.19) dated 13/08/2024	Compliant	Confirmed during the Initial Construction Audit, the requirements outlined by Condition B30 are outlined in the TTMP. (a) During the site audit inspection speed signs were observed enforcing the 30km/h speed limit. (b) Condition has not been triggered during the audit period (B. Toohey pers. comm). (c) Not triggered. No vessels have been purchased by the development during the audit period (B. Toohey pers. comm).	
Bridge Crossing – Sheep Station Creek					
B31.	The Proponent must ensure that any temporary and the permanent bridge over Sheep Station Creek is designed and constructed to comply with the relevant requirements of the: (a) Relevant Austroads Standards (such as elevating them above the 1% AEP flood level); (b) Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018); and (c) Policy and Guidelines for Fish Habitat Conservation (DPI, 2013) and Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries, 2003).		Compliant	Confirmed during Construction Audit 2, the temporary and permanent design of Sheep Station Creek Bridge complies with all guidelines outlined by Condition B31.	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Traffic and Transport Management Plan					
B32.	Prior to commencing construction or road upgrades identified in condition B27 (whichever comes first), the Proponent must prepare a Traffic Management Plan for the development in consultation with FCNSW, NPWS, TfNSW, Snowy Valleys Council, Snowy Monaro Regional Council and NSW Police, and to the satisfaction of the Planning Secretary. This plan must include: (a) details of the transport route to be used for all development-related traffic; (b) details of the road upgrade works required by condition B27 of this approval; (c) details of the measures that would be implemented to comply with the transport management requirements in conditions B25 to B30 above; (d) details of the measures that would be implemented to: i) 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 B29 of this approval; • a description of the proposed measures for managing traffic flow around the work sites, construction compounds and accommodation camp; • scheduling heavy vehicle movements to avoid peak periods; • minimising convoy lengths; • reducing the speeds of development-related traffic at key intersections along the Snowy Mountains Highway, including the Link Road intersection; • temporary traffic controls, including detours and signage; • procedures for stringing cables and transmission lines across roads and Talbingo Reservoir; • 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 queueing on the public road network; • minimising impacts to the public using Talbingo Reservoir and any water related infrastructure such as the O'Hares campground boat ramp; • implementing measures to minimise development-related traffic on the public road network outside standard construction hours; • minimising dirt and debris tracked on to the public road network from development related-traffic; • details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; • encouraging car-pooling or ride sharing by employees; • scheduling the haulage vehicle movements to minimise convoy lengths or platoons; • responding to local climate conditions that may affect road safety, such as snow, ice, fog, dust, wet weather and flooding;	Traffic And Transport Management Plan (rev.018) dated 14/06/2024 Snowy 2.0 Transmission Connection Review TTMP, TfNSW Comment Response Letter dated 10/02/2025 Weekly HSE Workplace Inspection dated 20/01/2025	**Non-compliant**	Confirmed during the Initial Construction Audit, a staged approach for the TTMP has been adopted. Stage 1 of the TTMP has been prepared and approved, addressing all requirements outlined in Condition B32. At the time of the audit, the TTMP for Stage 2 was pending approval from the Planning Secretary (J. Snape pers. comm). Evidence of implementation of the TTMP (rev.018) was observed during the site audit inspection. Management measures included: • Enforcement of speed limit signs, along with additional warning signs when approaching the development. • No observed use of mobile phones in moving vehicles. • Mandatory breath testing for all personnel upon entry to both Project sites, requiring a 0.00 Blood Alcohol Concentration. • All cars when not in use were reversed parked in designated carparking areas. • Availability of drip trays on-site. The approved TTMP requires that loaded vehicles entering or leaving the site have their loads covered**. During the site audit, one loaded truck was observed entering the Maragle Compound with an uncovered load.** It is noted that load coverage is checked weekly in accordance with the Weekly Environmental Inspection Checklist, with no issues reported during the audit period (J. Snape pers. comm). Based on available information, this appears to be an isolated incident. Additionally, **no verifiable evidence could be provided to show monthly inspections of transport routes and traffic monitoring were being undertaken during the audit period as required by Section 8.5 of the approved TTMP**. UGL provided the HSE Weekly Inspection for review; however, review of this document found that it contains minimal information related to traffic management and does not fulfill the requirements of the TTMP in this regard. It is noted inspections and discussions are undertaken on site informally through weekly construction meetings, safety conversations, sub-contractor meetings and site-based walkthroughs (J. Snape pers. comm). **Opportunity for Improvement: It is recommended that all relevant personnel, contractors and delivery drivers are aware of the requirements under the TTMP for loaded vehicles travelling to site to be covered and contained.** **Recommendation: It is recommended monthly inspections of transport routes be undertaken as required by Section 8.5 of the approved TTMP to ensure compliance, safety, and effective traffic management.** **Recommendation: It is recommended that the HSE Weekly Inspection form be revised to incorporate traffic monitoring. This will help ensure the development minimises impacts on local traffic, including school bus routes, and preventing the incidence of queuing on public roads.**	**NC-06**

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
	• ensuring loaded vehicles entering or leaving the site have their loads covered or contained and leave site in a forward direction; • responding to any emergency repair or maintenance requirements; • provisions for maintaining access to the site for FCNWS, NPWS and emergency vehicle access to the site at all times; • a traffic management system for managing over-dimensional vehicles; and • fatigue management; ii) minimise the impacts of the road and intersection upgrades of the development; iii) provide sufficient parking on site for all vehicles and ensure vehicles associated with the development do not park on the public road network; iv) maintain all roads and water-related infrastructure on site in a safe and serviceable condition; iii) minimise the traffic noise impacts of the development; (e) details of the haulage of spoil to be disposed within Kosciuszko National Park in accordance with condition B7; (f) ensure any vessel or structure occupying waters must display appropriate shapes and lights in accordance with the Marine Safety (Domestic Commercial Vessel) National Law 2012; (g) include a detailed: i) Heavy Vehicle Salvage Plan; ii) Driver's Code of Conduct; iii) Marine Transport Management Plan; iv) Snow & Ice Traffic Management Plan; v) Communication Strategy to keep the public informed about the impacts of the development; (h) include a program to: i) ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; ii) record and track vehicle movements; and iii) monitor and publicly report on the effectiveness of these measures. Following the Planning Secretary's approval, the Proponent must implement the Traffic Management Plan.				
Long-Term Road Strategy – Kosciuszko National Park					
B33.	Within 2 years of the commencement of construction, unless the Planning Secretary agrees otherwise, the Proponent must prepare a Long-Term Road Strategy for the development to the satisfaction of NPWS. This strategy must: (a) identify the road network within the Kosciuszko National Park required for the development during operations, including the detailed specifications for this road network; (b) identify which roads within the Kosciuszko National Park can be narrowed or closed following construction and then rehabilitated; (c) include a detailed program for the rehabilitation of these roads, which can be incorporated into the Rehabilitation Management Plan for the development; and (d) identify future road maintenance and funding responsibilities for the long-term road network following construction. Following NPWS's approval, the Proponent must implement the Long-Term Road Strategy.		Not triggered	The Long-Term strategy is not required to be prepared during this audit period.	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
VISUAL AMENITY					
Visual Appearance					
B34.	The Proponent must: (a) take reasonable steps to minimise the visual impacts of the development; (b) ensure all transmission towers blend into the surrounding landscape as far as possible and minimises the potential for glare and reflection by either: i) painting towers with a colour that; and/or ii) pre-dulling towers with a finish that; (c) ensure the visual appearance of ancillary facilities (including paint colours), blends in as far as possible with the surrounding landscape; and (d) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Visual Impact Management Plan (rev 14) dated 27/07/2024	Compliant	(a) Transgrid continue to commit in taking all reasonable steps to minimise the visual impacts of the development. Confirmed during the Initial Construction Audit mitigation measures regarding visual impacts are provided in Section 5.2 – 5.8 of the Visual Impact Management Plan (rev 14). Measures include painting perimeter security fencing. (b) Gantries have been constructed during the audit period. All constructed gantries have been painted (B. Toohey pers. comm). (c) The auxiliary switch room was the only ancillary facility installed during the audit period. The switch room was observed to be olive green colour during the site audit inspection. (d) As outlined in Section 5.7 of the Visual Impact Management Plan (rev 14) only mandatory safety, identifying or directional signs may be placed on ancillary buildings. No additional signage for other purposes including advertising may be placed on buildings. No additional signage was observed during the site audit inspection.	
Lighting					
B35.	The Proponent must: (a) take all reasonable steps to minimise the off-site visual impacts of the development; and (b) ensure that any external lighting associated with the development: i) is installed as low intensity lighting (except where required for safety or emergency purposes); ii) does not shine above the horizontal; and iii) complies with Australian/New Zealand Standard AS/NZS 4282:2019 – Control of Obtrusive Effects of Outdoor Lighting.	Visual Impact Management Plan (Rev 14) dated 27/07/2024	Compliant	Lighting associated with the development has been installed in compliance with Australian/New Zealand Standard AS/NZS 4282:2019 - Control of Obtrusive Effects of Outdoor Lighting. During the site audit inspection lighting was observed to be installed as low intensity , directional lighting which was also confirmed by (B. Toohey and J. Snape pers. comm). No permanent lighting has been installed during the audit period (B. Toohey pers. comm).	
Visual Impact Management Plan					
B36.	Prior to the commencement of construction, the Proponent must prepare a Visual Impact Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared in consultation with FCNSW and the NPWS; (b) describe the measures that would be implemented to comply with condition B34 above; and (c) include detailed plans for minimising the visual impacts of the following permanent infrastructure: i) Maragle switchyard and substation; ii) transmission line, towers and easement. Following the Planning Secretary's approval, the Proponent must implement the Visual Impact Management Plan for the development.	Visual Impact Management Plan (rev 14) dated 27/07/2024 Steel Sample NPWS Email Correspondence dated 29/05/2024	Compliant	Confirmed during the Initial Construction Audit, a Visual Impact Management Plan has been prepared and approved for the development. The Visual Impact Management Plan addresses all requirements outlined by Condition B36. During the audit period the revised Visual Impact Management Plan (rev 14) was approved by the Planning Secretary on the 25 October 2024. This Visual Impact Management Plan (rev 14) includes the changes recommended in the Initial Construction Audit which includes outlining detailed plans for minimising visual impacts of the Maragle substation and the transmission line easement. As required by the Visual Impact Management Plan Transgrid had provided NPWS with a sample 250mm length of galvanised steel angle pre-dulled sample in Construction Audit 2. It is noted additional samples would be provided to NPWS prior to installation (J. Snape pers. comm).	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
PARK VALUES					
B37.	The Proponent must make the following payments to NPWS for residual impacts of the development on park values: (a) $1 million prior to carrying out any development; (b) $1 million within 1 year of commencing construction; (c) $1 million within 2 years of commencing construction; (d) $1 million within 3 years of commencing construction; (e) $1 million within 4 years of commencing construction; unless the Planning Secretary agrees otherwise. Note: The NPWS will use these funds and any interest generated by these funds to enhance the park values of the Kosciuszko National Park. The NPWS will: • develop a detailed program for the allocation of these funds to specific projects; • monitor, evaluate and publicly report on the spending of these funds and the effectiveness of these projects.		Compliant	Confirmed during the Initial Construction Audit Snowy Hydro Limited on behalf of Transgrid have submitted 2 payments of $1,000,0000 to the Department of Planning and Environment Finance Shared Services required to be paid prior to carrying out any development and within 1 year of commencing construction. The third payment is not triggered to be paid during this audit period.	
B38.	Within 6 months of the commencement of construction, the Proponent will prepare an Additional Easement Rehabilitation Strategy to the satisfaction of NPWS, to undertake the following infrastructure projects, that addresses: (a) Providence Portal substation to Tantangara Dam – removal of transmission line, replacement with a standalone supply or underground line between the Snowy 2.0 Tantangara intake/portal area and Tantangara Dam area, and rehabilitation of the easement; (b) Eucumbene Portal to Happy Jacks transmission – transmission lines being removed and replaced by an alternative standalone power supply and rehabilitation of the easement; and (c) timing for each program of works. Following approval, the Proponent must implement the Additional Easement Rehabilitation Strategy.	11 kv Line Rehabilitation Strategy dated 11/05/2024	Compliant	Confirmed during the Construction Audit 2, an Additional Easement Rehabilitation Strategy was prepared within 6 months of the commencement of construction and was prepared in consultation with and to the satisfaction of NPWS. (a)(b) An overview of Infrastructure Projects is briefly included in Section 1, with location of the proposed works illustrated in Figure 1 and Figure 2. The removal of infrastructure is detailed in Section 7 with rehabilitation approach included in Section 8. It is noted further detail retaining to soil and vegetation rehabilitation will be detailed in future REF(s) and Rehabilitation Management Plans. (c) The timing of program works is included in Section 11 which outlines: • The removal of the Eucumbene to Happy Jacks Transmission line is scheduled to commence in Summer 2024/2025. • The removal of Providence Portal to Tantangara Transmission line is scheduled to occur late 2027. During the audit period Transgrid removed all transmission lines from Eucumbene to Happy Jacks as per the timings outlined in the Additional Easement Rehabilitation Strategy (J. Snape pers. comm). **During the audit, it was unclear whether the Additional Easement Rehabilitation Strategy was tracked or accounted for. There was limited evidence to demonstrate how the implementation of these measures included in this strategy were being monitored, recorded, or reported to ensure compliance.** **Recommendation: It is recommended that the management commitments of the 11 kV Line Rehabilitation Strategy be included in the relevant compliance registers to ensure all required measures are met.**	
HAZARD AND RISK					
Dangerous Goods					
B39.	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.	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit mitigation measures addressing the storage, handling and transport of dangerous goods is included in the SWMP (rev 0.10). During the site inspection chemicals were generally well organised / kept in bunded areas / areas appeared to meet site volume requirements for chemical and hydrocarbons. Hydrocarbon and chemical storage areas were observed to be well maintained**.**	
Electric and Magnetic Fields					
B40.	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 – 100 kHz) (ICNIRP, 2010).		Not triggered	The development is still undergoing detailed design (B. Toohey pers. comm).	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Operating Conditions					
B41.	The Proponent must: (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (b) ensure that the development; i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; ii) is suitably equipped to respond to any fire 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; iii) incorporates the recommendations of a fire risk assessment as per Transgrid's design standards; (c) ensures that buildings within the compounds comply with Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019; (d) ensure any fire trails or asset protection zones associated with the development are wholly contained within the approved disturbance area; (e) develop procedures to manage potential fires on site, in consultation with the RFS, FRNSW, FCNSW and NPWS; (f) assist the RFS, FRNSW, FCNSW, NPWS and emergency services as much as practicable if there is a fire in the vicinity of the site; and (g) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.	Bushfire Plan (Rev 0.06) dated 30/08/2023 Emergency Plan (Rev 0.07) dated 25/06/2024	Compliant	(a) Confirmed during the Initial Construction Audit, bushfire mitigation measures for the development are included in Section 5 of the Bushfire Plan. (b) i) Confirmed during the Initial Construction Audit, APZ works undertaken during construction will be in accordance with Appendix 4 of Planning for Bush Fire Protection (NSW RFS, 2019). ii) A minimum 20,000L dedicated fire water supply tank is available at three assembly areas including UGL Switchyard, UGL Lobs Hole Compound, and FGJV Lobs Hole Accommodation Camp. iii) The development is still subject to detailed design (J. Snape pers. comm). (c) Consistent with the Initial Construction Audit Transgrid and UGL have considered and are ensuring buildings comply with the Australian Standard AS3959-2018 Construction of buildings in bushfire-prone areas (or equivalent) and RFS's Planning for Bushfire Protection 2019 as part of final IFC design (J. Snape pers. comm) (d) Consistent with the Initial Construction Audit, the final IFC design of Project has not been completed for the Project during this audit period. Transgrid and UGL have assured access tracks and APZs associated with the development are wholly contained within the approved disturbance area (J. Snape pers. comm). (e) Confirmed during the Initial Construction Audit, the Bushfire Plan which is included as an appendix in the Emergency Plan has undergone consultation with RFS, FRNSW, FCNSW and NPWS. See Condition 42. (f) Noted (g) Not triggered during the audit period.	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Emergency Plan					
B42.	Prior to commencing construction, the Proponent must prepare and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, in consultation with the Local Emergency Management Committee and to the satisfaction of the NPWS, FCNSW, RFS and FRNSW. This plan must: (a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by NPWS and FCNSW; (b) be consistent with: i) the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning', ii) Kosciuszko National Park Fire Management Strategy 2008-2013 (NPWS, 2008), iii) FCNSW Guidelines including the Code of Practice for Timber Harvesting in Softwood Plantations 2022; iv) RFS's Planning for Bushfire Protection 2019 (or equivalent); v) RFS's Development Planning – A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (RFS, 2014); vi) the Fire and Rescue NSW Act 1989; and vii) the Work Health and Safety (WHS) Act 2011; (c) include evacuation protocols for the site; (d) describe the measures that would be implemented to: i) minimise the risk of bushfire on site; ii) protect the assets on site from bushfires; iii) respond to any bushfires on or in the vicinity of the site; iv) minimise flood risks on site, including flooding response procedures; v) minimise the risk of landslips on site, including landslip response procedures; vi) evacuate the site in an emergency; and (e) include details on how live transmission infrastructure can be safely isolated in an emergency. The Proponent must implement the Emergency Plan for the duration of the development.	Emergency Plan (rev 0.07) dated 25/06/2024 Evacuation Drill Checklist Maragle dated 17/09/2024 Evacuation Drill Checklist Lobs Hole dated 08/10/2024	Compliant	Confirmed during previous Construction Audits, an Emergency Plan has been prepared and approved for the development, addressing all requirements outlined in Condition B42. The Emergency Plan was not revised during the audit period. A review of the Emergency Plan (rev 0.07) during this audit period highlighted that Section 7.3 specifies the plan should be provided annually to the Local Emergency Management Committee, NSW RFS, NSW SES, FRNSW, NPWS, and FCNSW for comment. The Emergency Plan was provided to NSW RFS, FRNSW, NPWS, and FCNSW during May 2024 but **no verifiable evidence was provided to show that the emergency plan was provided to the Local Emergency Management Committee and NSW SES for comment.** **Appendix F of the Emergency Plan was also reviewed and found to be outdated, lacking relevant site contact information**. As outlined in Section 6.3 of the Emergency Plan, the development is required to invite representatives from the local NSW RFS Brigade, FCNSW, FRNSW, and NPWS to the site for familiarisation visits, fire response training, and evacuation drills. **No verifiable evidence was provided to show that these stakeholders were given the opportunity to attend.** However, an evacuation drill was held at Lobs Hole on 8 October 2024 and at Maragle on 17 September 2024 (outside audit period), prior to the bushfire season commencing on 1 November. Additionally as outlined by Section 5.1.5.2, simulation exercises are required to be undertaken every 6 months. In the last six months simulation exercises have been undertaken at both Maragle (17 September 2024) and Lobs Hole sites (8 October 2024). A consequence management guide has been developed for the development. During the site audit inspection, substantial fuel loads were observed across the development area. Transgrid has been in consultation with FCNSW and NPWS regarding their removal (J. Snape pers. comm). **Recommendation: It is recommended that the Emergency Plan be submitted to the Local Emergency Management Committee and NSW SES for comment** as **soon as practicable because it has not been submitted annually required.** **Recommendation: It is recommended that Transgrid notify NSW RFS Brigade, FCNSW, FRNSW, and NPWS of the evacuation drill that was held, acknowledge it was an oversight not to invite them, and confirm their intention to ensure they are invited to attend the next drill.** **Opportunity for Improvement: It is recommended that Appendix F be updated to reflect relevant and current contacts, as it is currently outdated.**	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
WASTE					
B43.	Excluding the spoil generated by the development from within KNP, 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 Strategy (Rev 0.09) dated 05/11/2024	Compliant	Confirmed during the Initial Construction Audit, a Waste Management Strategy has been prepared for the development and addresses the requirements outlined by Condition B43. During the site inspection it was observed waste was generally being segregated with exception of one skip bin located at Lobs Hole. **It was evident waste was not segregated with timber, fabric and oily rags all located within the same bin.** It was noted by UGL staff the skip bin was under the responsibility of Ocon who serves as a contractor under UGL. **Opportunity for Improvement: It is recommended at the Lobs Hole site that waste under the responsibility of Ocon is included in weekly inspections undertaken by UGL to ensure waste is segregated appropriately across the whole development.**	
B44.	The importation of waste and 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.	UGL Imported Material Tracking Register	Compliant	During the audit period only road base, rock, sand and dust has been imported to site (Import Material Tracking Register sighted). No waste has been imported to site during the audit period (J. Snape pers. comm).	
B45.	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.		Compliant	Confirmed during the Initial Construction Audit, waste from the development is exported to a site licensed by the EPA. Waste originating from the east development alignment is exported to Bellettes Landfill (EPA Licenced Facility) and waste from the from the west development alignment is exported to Forest Hill Liquid Waste Storage and Transfer Station which is operated by JJ Richards and Sons.	
B46.	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.	Transgrid C1611 Maragle 330kv Switching Station And 330kv Transmission Line Connections Monthly Project Update dated January 2025 Transgrid C1611 Maragle 330kv Switching Station And 330kv Transmission Line Connections Monthly Project Update dated February 2025	**Non-compliant**	Consistent with previous Construction Audits, waste removed from site is tracked by UGL and is reported monthly within UGL Monthly Status Reports. Waste reported in these documents are also further broken down in accordance with the EPA's Waste Classification Guidelines. In response to the recommendation from Construction Audit 2, **Transgrid have been unable to obtain waste dockets to verify the appropriate disposal of waste. Due to the absence of waste dockets and the specific requirements of B46, this condition has been marked as non-compliant.** While formal waste tracking is only mandated for Schedule 1 wastes under the Protection of the Environment Operations (Waste) Regulation 2014, it is noted that oily rags may fall under the classification of "waste hydrocarbons" under Schedule 1 if they are contaminated with hydrocarbon-based substances. In such cases, formal tracking requirements would apply. In addition, record-keeping obligations apply more broadly to all waste management activities to support transparency, traceability, and accountability. This includes maintaining accurate records of waste type, quantity, source, and disposal location typically evidenced through weighbridge dockets, waste receipts, or equivalent documentation. The applicable condition specifically requires that such records and disposal dockets be retained for audit purposes; however, these records were not available for review. **Recommendation: It is recommended Transgrid obtain appropriate records and waste dockets from JJ Richards and Belletes for all waste removed from Project Site East and West for disposal as required by condition B46.**	**NC-07**

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Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
REHABILITATION					
B47.	The Proponent must: (a) rehabilitate all parts of the site within the Kosciuszko National Park to comply with the rehabilitation objectives in Table 2 and the ecological rehabilitation objectives in Table 3; (b) rehabilitate the Bago State Forest site to comply with the rehabilitation objectives in Table 2; (c) complete the rehabilitation of the site, including the removal of all temporary infrastructure, creation of landforms, narrowing of roads within 3 years of completing construction; (d) complete the ecological rehabilitation of the site, apart from areas used for operations, within 20 years of completing construction; (e) complete the final rehabilitation of the site, including the removal of all remaining infrastructure within 3 years of decommissioning the development; and (f) complete the ecological rehabilitation of the areas used for operations within 20 years of decommissioning the development. Table 2 Rehabilitation Objectives **Table 2 Rehabilitation Objectives** **Feature** / **Objective** **Land Use** — Return the site to its previous use in consultation with NPWS and FCNSW **Land** — Safe, stable and non-polluting; Progressively rehabilitate the site as soon as possible following disturbance; Employ interim rehabilitation strategies to areas that can't be permanently rehabilitated yet to minimise dust generation, erosion, uncontrolled discharges of sediment, and the spread of weeds to other parts of the Kosciuszko National Park; **Infrastructure** — Decommission and remove infrastructure, unless NPWS and/or FCNSW agrees otherwise; **Community** — Ensure public safety Table 3 | Ecological rehabilitation objectives, including indicative completion criteria and performance indicators **Table 3 | Ecological rehabilitation objectives, including indicative completion criteria and performance indicators** **Ecological rehabilitation objective** / **Completion criteria** / **Performance indicators** **Objective 1**: The vegetation composition of the rehabilitation is recognisable as a plant community type (PCT) contained within the BioNet Vegetation Classification and which was present on site prior to the project's temporary disturbance — (a) Native plant species composition is characteristic of the target PCT based on suitable analysis against a reference data set using the PCT Assignment Tool (b) The target PCT BAM composition score is within or greater than the inter-quartile range of local reference site values for the assigned PCT. — All native vascular plant species are monitored to species level from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary. Monitoring should include appropriate reference sites outside the disturbance area, ideally capturing the range of variation of the 2003 and 2019/20 fires. **Objective 2**: The vegetation structure of the rehabilitation is recognisable as, or shows a substantial trend towards, a PCT contained within the BioNet Vegetation Classification and which was present on site prior to the project's temporary disturbance — Cover, abundance and height range of native plant growth forms are characteristic of the target PCTs and within or greater than the inter-quartile range of local reference site values for the assigned PCT. — The cover, abundance and height range of all native vascular plant species are monitored from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary. **Objective 3**: Levels of ecosystem function have been established that demonstrate the rehabilitation is self-sustainable or shows a substantial trend towards a self-sustaining state. — Growth medium, including topsoil, is suitable for target PCTs establishment, and indicators of nutrient cycling are suitable for sustaining the target PCTs All priority attributes of nutrient cycling, soil processes and both subsoil and topsoil properties should be within or greater than the interquartile range of local reference site values for the assigned PCT. — Growth medium, covering both subsoil and topsoil properties, and soil processes are monitored using methods approved by the Planning Secretary. Rehabilitation vegetation communities are maturing, and natural recruitment is occurring for species within each growth form at rates within or greater than the interquartile range of local reference site values for the assigned PCT. — All species are monitored for establishment of second-generation juveniles/immatures and capacity for recruitment from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary The number and ground cover of weed species is comparable to, or less than, the interquartile range of local reference site values for the assigned PCT — Number and ground cover of weed species are monitored from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method, and/or other method approved by the Planning Secretary. Fauna habitat features and resources (food and shelter characteristics) within the rehabilitation vegetation communities are present and within or greater than the interquartile range of local reference site values for the assigned PCT. — Presence/absence of some fauna habitat features (e.g. flowering plant, decorticating bark, stags with hollows and/or nest boxes) and quantitative assessment of other features (e.g. leaf litter cover, bare ground, wood debris) are monitored from fixed 0.04 ha monitoring plots in accordance with the BAM, transect intercept method and/or other method approved by the Planning Secretary.		Not triggered	Construction has not been completed. Initial rehabilitation works are required within three years of completion of construction. Therefore, this condition has not been triggered.	

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Rehabilitation Management Plan					
B48.	Within 12 months following commencement of construction, the Proponent must prepare a Rehabilitation Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person in consultation with the NPWS, FCNSW, BCS, EPA, NSW DPI and TfNSW; (b) be consistent with the Spoil Management Plan, Long-Term Road Strategy and Visual Mitigation Management Plan; (c) include a conceptual plan for the rehabilitation of the whole site; (d) include the detailed program for the rehabilitation of roads in the Kosciuszko National Park in accordance with the approved Long-Term Road Strategy; (e) include a topsoil balance for the site, which includes a strategy for: i) maximising the reuse of topsoil on site (provided it is suitable for reuse); ii) using other suitable growth media; and iii) importing additional topsoil to the site (if necessary); (f) include a native seed collection and propagation program in accordance with Florabank (www.florabank.org.au) and/or NPWS guidelines for the site, which includes a strategy for: i) maximising the collection and use of native seed resources from the site prior to disturbance; ii) collecting seed from the surrounding area, including other parts of the Kosciuszko National Park (with the approval of the NPWS); and iii) prioritising the use of local sources of seed for the ecological rehabilitation of the site; (g) include a detailed ecological rehabilitation management plan for the development that: i) provides an overarching description of the proposed ecological rehabilitation works, identifying the: • plant community types to be established; and • area of land to be established for each plant community type; ii) provides maps showing the proposed location of each plant community type; iii) describes the detailed measures that would be implemented to comply with the ecological rehabilitation objectives in Table 3; (h) identify the key risks to the successful completion of the rehabilitation and describe the contingency measures that would be implemented to address these risks; (i) include detailed completion criteria and performance indicators for the rehabilitation of the development (having regard) to the criteria and indicators in Table 3, including criteria for triggering remedial action (if necessary); and (j) include a program to monitor and publicly report on: i) the rehabilitation of the site; ii) the implementation of the each of the detailed plans, including the effectiveness of the proposed mitigation and contingency measures; and iii) progress against the detailed completion criteria and performance indicators. Following the Planning Secretary's approval, the Proponent must implement the Rehabilitation Management Plan.	DPHI Extension Request Approval Letter dated 06/11/2024 DPHI Portal Post Approval Form - RMP dated 03/02/2025	Compliant	An extension was sought during the audit period to extend the submission date of the RMP. The Planning Secretary approved this extension request on the 06 November 2024 extending the submission date to the 04 April 2025. The RMP was submitted to the Planning Secretary for approval on the 03 February 2025. At the time of the audit the RMP was pending approval (J. Snape pers. comm).	

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Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
ENVIRONMENTAL MANAGEMENT STRATEGY					
C1.	Prior to commencing development, 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; (b) identify the statutory approvals that apply to the development; (c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (d) set out the procedures that would be implemented to: i) keep the local community and relevant agencies informed about the operation and environmental performance of the development; ii) receive, handle, respond to, and record complaints; iii) resolve any disputes that may arise; iv) respond to any non-compliance; v) respond to emergencies; and (e) include: i) references to any strategies, plans and programs approved under the conditions of this approval; and ii) a clear plan depicting all the monitoring to be carried out in relation to the development, including a table summarising all the monitoring and reporting obligations under the conditions of this approval. Following the Planning Secretary's approval, the Proponent must implement the Environmental Management Strategy.	Environmental Management Strategy (rev 0.08) dated 5/08/2024 DPHI Approval Letter EMS dated 14/02/2025	Compliant	Confirmed during the Initial Construction Audit, the EMS was approved by the Planning Secretary on the 03 August 2023 prior to commencement. During this audit period a revised EMS (rev 0.08) has been approved by the Planning Secretary on the 14 February 2025 to reflect Stage 2 Works. (a) Included in Appendix D TransGrid Environmental Framework. (b) Included in Section 2. (c) Included in Section 3.10. (d) i) Included in Section 4.5. ii) Included in Section 4.2. iii) Included in Section 4.2. iv) Included in Section 3.12. v) Response to emergencies is mentioned in Section 3.7, with further detailed provided in the Emergency Plan. (e) i) Included in Appendix D Document Map. ii) Included in Section 3.8 Table 3.2.	
REVISION OF STRATEGIES, PLANS AND PROGRAMS					
C2.	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 months of the: (a) the submission of an incident report under condition C7; (b) the submission of an Independent Audit under condition C10; (c) the approval of any modification of the conditions of this approval; or (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review.	Summary_DCR_All_Plans Register received 28/02/2025	Compliant	Consistent with previous Construction Audits, a number of relevant strategies, plans, and programs were required to be reviewed during the audit period, as triggered by the requirements of this condition. These include the EMS, BMP, SWMP, TTMP, NVMP, Visual Impact Management Plan, Emergency Plan, and Additional Easement Strategy. In response to a recommendation from Construction Audit 2, Transgrid has revised the Management Plan Summary Document Control Register (sighted) to track and document all reviews. The register indicates whether each plan has been reviewed and whether any revisions were necessary. A review of the register confirms that all key management plans and strategies such as the EMS, BMP, SWMP, TTMP, and NVMP have been reviewed and, where required, revised. It is noted **the Visual Impact Management Plan, Emergency Plan, and Additional Easement Strategy have been excluded from the register how**ever Transgrid notes that these plans have been reviewed with no amendments required (J. Snape pers. comm). **Opportunity for Improvement: It is recommended going forward for completeness that all plans including strategies should be included in the Management Plan Summary Document Control Register to accurately document the requirement of condition C2 has been implemented.**	

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Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS					
C3.	With the approval of the Planning Secretary, the Proponent may: (a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 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.	DPHI Exemption to undertaker Consultation Approval Letter NVMP dated 07/02/2025 DPHI Approval Letter BMP dated 14/02/2025 DPHI Approval Letter SWMP dated 11/02/2025 DPHI Approval Letter EMS dated 14/02/2025 DPHI Approval Letter NVMP dated 14/02/2025 Major DPHI Post Approval Form Transport Strategy Submission n.d. DPHI Post Approval Form TTMP Submission n.d.	Compliant	(a) Confirmed during the Initial Construction Audit the Planning Secretary approved a staging request to prepare management plans on a staged basis on the 27 March 2023 allowing the development scope to be delivered in two stages: • Stage 1 – All activities associated with the construction and operation of infrastructure related to the 330 kV grid connection. • Stage 2 – All activities associated with the construction and operation of infrastructure related to the 500 kV component of the substation. No requests were submitted during this audit period. (b) Confirmed during the Initial Construction Audit, a request was sought from Transgrid to combine the Spoil Management Plan and Water Management Plan. The Planning Sectary approved the request on the 18 November 2022. No requests to combine any strategy, plan or program were submitted during this audit period. (c) During the audit period, majority of management plans have been revised. A request was sought from Transgrid seeking exemption from consultation as part of the Stage 2 Management Plan revisions. The Planning Secretary approved the request on the 7 February 2025 with exception of the Transport Strategy and Traffic and Transport Management Plan which would be subject to consultation. The current status of approved management plans and strategies required by this approval is provided below: • EMS – Revision 0.08 was submitted to Planning Secretary on the 16 December and was approved on the 11 February 2025. • BMP – Revision 0.13 was submitted to Planning Secretary on the 16 December 2024 and approved by the Planning Secretary on the 14 February 2025. . • SWMP - Revision 0.10 was submitted to the Planning Secretary on the 16 December 2024 and was approved on the 11 February 2025. • NVMP – Revision 0.07 was submitted to Planning Secretary on the 22 November 2024 and was approved on the 11 February 2025. • TTMP – Revision.20 is still pending approval at the time of the audit. • Transport Strategy Rev.10 still pending approval at the time of the audit • Additional Easement Strategy –Not revised during the audit period. • Heritage Management Plan – Revision 8 was submitted to the Planning Secretary on the 22 November 2024 and was approved on the 7 February 2025. • RMP – Pending Planning Secretary approval. • Emergency Plan – Revision 0.07 was not revised during this audit period. • Visual Impact Management Plan - Revision 14 was not revised during this audit period. **It is noted that the BMP and SWMP have been revised and are subject to further review and approvals following recommendations from previous construction audits. However, given the time that has passed, there is an increased risk if the recommended measures are not implemented promptly.** **Recommendation: It is recommended that the BMP and SWMP be revised to incorporate the recommendations outlined in previous construction audits, to ensure appropriate mitigation measures can be effectively implemented onsite. This should be treated as a priority. Consultation with DPHI may be required to facilitate close out of the Departments review and approval of these updates.**	

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Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
NOTIFICATIONS					
Notification of Department					
C4.	Prior to commencing development, construction, operations, upgrading or decommissioning of the development, the Proponent must notify the Department in writing via the Major Projects website portal and NPWS and FCNSW 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.	Biodiversity Management Plan (Rev 0.12) dated 22/11/2023	**Non-compliant**	Confirmed during the Initial Construction Audit prior to commencing construction Transgrid submitted a notification in writing to Major Projects website portal, FCNSW, NPWS and DCCEEW. At the time of the audit the development was described as being in Stage 1 of construction. A review of post-clearing reports indicates that clearing associated with Stage 2 has commenced. The BMP was reviewed, and it is noted that clearing requirements for the substation area are included in Appendix B – Clearing Procedure. However, the SWMP defines Stage 1 works as being limited to transmission line construction only. **At the time of the audit, there was no verifiable evidence available to confirm that the Department, NPWS, or FCNSW were notified that Stage 2 works had commenced, as required under the project's regulatory commitments.** **Recommendation: It is recommended that Transgrid notify the Department, NPWS and FCNSW in writing that Stage 2 works have commenced.**	**NC-08**
Final Layout Plans					
C5.	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 and 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. Works as Executed Plans.		Compliant	Confirmed during the Initial Construction Audit detailed designs of the development were issued to the Department via the Major Projects website prior to the commencement of construction.	
C6.	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 triggered	The development is currently undertaking construction. Operations have not commenced (J. Snape pers. comm).	

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Incident Notification					
C7.	The Department and the NPWS must be notified via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 5.	Major Projects Notification - Track 8 Turbid Water Discharge (rev 1) dated 19/10/2024 Major Projects Notification - Track 8 Turbid Water Discharge (rev 3) dated 1/12/2024 Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 28/12/2024 Major Projects Notification - Track 5 and Track 8 Turbid Water Discharge 5-7 December 2024 (rev 2) dated 19/10/2024 Major Projects Notification - Track 2 Turbid Water Discharge dated 8/12/2024 Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 8/12/2024 Major Projects Notification - Track 8 Turbid Water Discharge dated 11/01/2025 Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 11/01/2025 Major Projects Notification - Maragle Switchyard Turbid Water Discharge dated 11/01/2025 Incident Notification (NPWS, CPHR & EPA) Email Correspondence dated 11/01/2025. Excavator Fall Incident Notification (NPWS and DPHI) Screenshot Incident Portal	Compliant	Identified in Construction Audit 2, an incident occurred on the final day of the audit period. While this incident falls outside the current audit period for Construction Audit 3, the notification process has been included in this audit period to ensure compliance. • *September 2024 Track 8 Turbid Water*: On 25 September 2024, 47.8 mm of rain was recorded within a 24-hour period for Project Area East. Post-rainfall inspections were undertaken and identified turbid water seeping beneath an earthen bund located on Access Track 8. The seeping turbid water was recorded to have discharged beyond the Project Area boundary. There were seven recorded incidents during the audit period. Each event was promptly reported to the Department and NPWS as soon as Transgrid became aware of the non-compliance. Details are below: • *October 2024 Track 8 Turbid Water Discharge:* A heavy rainfall event of approximately 50mm was recorded on the 18 October within Project Area East leading to turbid water discharging from the entrance of Track 8 towards Wallaces Creek within the development area. Notification to the Department, NPWS, CPHR and AG DCCEEW was sent on the 19 October 2024 with a detailed report being provided on the 24 October 2024. • *November 2024 Track 5 and Track 8 Turbid Water Discharge:* A heavy rainfall event of approximately 92 mm of rainfall was recorded within development area (East) over the period of 27 November 2024 to 1 December 2024. Turbid water had discharged from Track 5 towards the western side of Sheep Station Creek and Track 8 towards Cave Gully and Yarrangobilly River within the development area. Notification was sent on the 28 November to the Department, NPWS, CPHR, EPA and AG DCCEEW. A second notification including additional information relating to discharge of turbid waters towards waterways within the development area for Track 5 and Track 8 was sent to Department, NPWS, CPHR, EPA and AG DCCEEW on the 28 November 2024 to account for water discharge from track 8. A third revised notification was sent to Department, NPWS, CPHR, EPA and AG DCCEEW on the 1 December 2024 to include additional details outlining the 120 hour, 90th percentile rainfall event which has extended from 27 November 2024 to 1 December 2024. A Detailed Report covering the incident was prepared on the 5 December 2024. • *December 2024 Track 5 and Track 8 Turbid Water Discharge*: A heavy rainfall event of approximately 132.4 mm was recorded within Project Area East over the period of 5-7 December 2024 causing turbid water to discharge from Track 5 towards the western side of Sheep Station Creek and Track 8 towards Cave Gully and Yarrangobilly River within the Project Area. First notification was sent to the Department, NPWS, CPHR, EPA and AG DCCEEW on the 06 December with a second revision sent on the 8 December 2024 which addressed impacts of further rainfall and turbid water discharges from Track 5 and Track 8 occurring on the 7 December 2024. A Detailed Report covering the incident was prepared on the 13 December 2024. • *December 2024 Track 2 Turbid Water Discharge*: A heavy rainfall event of approximately 61.1 mm of rainfall was recorded within Project Area West between 5-7 December 2024. On 7 December 2024 inspections noted turbid water had discharged from Track 2 outside of the Project Area boundary. Notification to the Department, CPHR, NPWS and AG DCCEEW was sent on the 8 December 2024. A Detailed Report covering the incident was prepared on the 14 December 2024. • *January 2025 Track 8 Turbid Water Discharge*: A localised storm resulting in approximately 11.2 mm of rain was recorded on 11 January 2025 within Project Area East over a period of 15 minutes. Inspections noted turbid water had discharged from the entrance of Track 8 towards Wallaces Creek within the Project Area. Notification to the Department NPWS, CPHR and AG DCCEEW was sent on the 11 January 2025. A Detailed Report covering the incident was prepared on the 17 January 2025. • *January 2025 Maragle Switchyard Turbid Water Discharge*: A heavy rainfall event of approximately 30mm was recorded within the Project Area West on 15 January 2025 leading to turbid water discharging from the entrance of the Maragle Switchyard carpark towards New Zealand Gully within the Project Area. Notification to the Department, NPWS, CPHR and AG DCCEEW was sent on the 16 January 2025. A Detailed Report covering the incident was prepared on the 17 January 2025. • *March 2025 Fall from Excavator*: the Injured Person was climbing down off the excavator track, lost their grip and fell approximately 1.8m to the ground at approximately 11:30am 7 March 2025. Notification to the Department and NPWS was sent on the 8 March 2025. The Planning Secretary responded on the 9 March acknowledging that SafeWork NSW has been also notified and a	

Snowy 2.0 Transmission Connection Project (Infrastructure Approval SSI 9717 – MOD 1					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
		Submission dated 8/03/2025 Fall from Excavator Detailed Report dated 14/03/2025		detailed report was being prepared. Although outside of this audit period, a detailed report was prepared on the 14 March 2025.	
Non-Compliance Notification					
C8.	The Planning Secretary and the NPWS must be notified in writing via the Major Projects website portal within seven days after the Proponent becomes aware of any non-compliance.		Compliant	No non-compliances were reported during the audit period (J. Snape pers. comm)	
C9.	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. Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.		Not triggered		
INDEPENDENT ENVIRONMENTAL AUDIT					
C10.	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.		Compliant	The Initial Construction Audit was undertaken 15 week post the commencement of construction as approved by the Planning Secretary on the 31 January 2024. The Second Construction Audit was undertaken within 6 months of the Initial Construction Audit. The Third Construction Audit was undertaken within 6 months of the Second Construction Audit which is in accordance with the requirements of the *Independent Audit Post Approval Requirements* (2020).	
ACCESS TO INFORMATION					
C11.	The Proponent must: (a) make the following information and documents publicly available on its website as relevant to the stage of the development: i) the EIS; ii) the final layout plans for the development; iii) current statutory approvals for the development; iv) approved strategies, plans or programs required under the conditions of this approval; v) the proposed staging plans for the development if the construction, operation and/or decommissioning of the development is to be staged; vi) 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; vii) how complaints about the development can be made; viii) any independent environmental audit, and the Proponent's response to the recommendations in any audit; and ix) any other matter required by the Planning Secretary; and (b) keep such information up to date.	Project website (sighted 03/03/2025)	**Non-compliant**	Transgrid generally provides all information required under this condition on its website: https://www.TransGrid.com.au/projects/snowy-2-0-transmission-connection-project/. All relevant documents, including the previous independent environmental audit, are available on the website with exception of the Additional Easement Strategy. **At the time of the audit the Additional Easement Strategy had not been uploaded to the Project Website.** It is also noted **recent summaries from water quality monitoring reports have not been uploaded**. The most recent publicly available report is from August 2024. Transgrid did reiterate that monitoring reports are currently being finalised and will be made available upon receipt (J. Snape pers. comm). **Recommendation: It is recommended the Additional Easement Strategy is uploaded to the Project website.** **Opportunity for Improvement: It is recommended the Project website is updated regularly to include monitoring results of the development.**	**NC-09**

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
General				
BMP1	Training will be provided to all Project personnel, including relevant sub-contractors on the requirements from this plan through inductions, toolboxes and targeted training. The training will outline key environmental features and threatened species to be protected and measures to be implemented. Site inductions must inform all personnel working in the Project area what the limit of works and Exclusion Zones are and where they occur.	Employee Induction Register Environmental Work Method Statements Toolbox talk records	Compliant	Identified in previous Construction Audits, Transgrid continue to ensure all employees and contractors inducted on site review the UGL Lobs Hole to Maragle 330kV Transmission Line & Switching Station Induction (sighted). The induction (revised during this audit period) covers Environmental Information and Compliance relevant to the conditions of this approval and is highlighted in Part 2 of the presentation. A copy of the employee induction was sighted on 11 March 2025. Consistent with previous Construction Audits, relevant mitigation measures are continued to be included in Environmental Method Statements (sighted) with toolboxes (sighted) also being held to increase environmental awareness for employees to ensure individuals are aware of their obligations related to their activities and the development.
BMP2	No clearing will occur outside the approved project footprint / disturbance area without prior approval from DPE, in consultation with BCD and NPWS.	WSP Consistency Assessment Report Snowy 2.0 Transmission Connection Project dated 5/02/2025	Compliant	A Consistency Assessment prepared by WSP dated 5 February 2025 and documents the changes to disturbance areas for access track and tower construction pad locations of the Project. The Consistency Assessment identified an overall decrease in impacts to plant community types (PCTs), with impacts decreasing for all PCTs except **PCT 999 which would be impacted by an additional 0.17 ha.** The Consistency Assessment did not include a detailed assessment of the associated impacts these changes would have on species polygons, as requested during the previous audit. Transgrid has noted further amendments to detailed design have been applied following the WSP Consistency Assessment resulting in an overall reduction of clearing impacts to PCT 999 to 8.56 ha, below the 8.60 ha limit on clearing. In result no further approvals or consultation will be required as there is no planned increase impact to any PCT. Transgrid has outlined the supporting consistency assessment will be provided for review during the next audit period (J. Snape pers. comm). **Recommendation: It is recommended the revised Consistency Assessment be prepared to provide further assessment of whether disturbance impacts to species polygons are consistent with the project approval and credit requirements identified in the BDAR.**
BMP3	If clearing of vegetation is required outside the Project area these areas would need further assessment, approval and recalculation of offset requirements in accordance with the CEMP (UGL, 2023a).	WSP Consistency Assessment Report Snowy 2.0 Transmission Connection Project dated 5/02/2025	Compliant	Refer to the findings and recommendations above for BMP2.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
Design				
BMP4	Detailed design will focus on the retention of managed shrub and groundcover vegetation zones, within the ECZ, HCZ and HTZ to avoid and minimise the loss of vegetation and habitat and movements of fauna across the landscape and to minimise the impact of predation on displaced fauna. This will be undertaken by UGL applying the clearing methodology and clearing zones presented in Appendix K of the Project BDAR (Jacobs, Rev 7, Aug 2022) to their detailed design.	LENECO Post-clearing Vegetation Integrity Monitoring Report in Partial Clearing Zones dated 13/04/25	**Non-Compliant**	During the site audit inspection, partial clearing areas in both Project East and Project West areas were inspected. In Project areas works within the Hazard Tree Zone (HTZ) had generally not commenced. Where work had occurred, it was limited to tree trimming activities only. In Project East, Hand Clearing Zones (HCZs) areas and Easement Clearing Zones (ECZs) treated as HCZ areas appeared to be well managed, with appropriate levels of grass and shrub cover observed to have been retained and efforts taken to minimise disturbance. However, in Project Area East during the site audit inspection a contractor was observed in one area applying the herbicide Grazon Extra using a vehicle-mounted, motorised pump and hose. It was advised that the herbicide was being applied to control invasive species such as blackberry (Rubus spp.) During the audit it was advised that within areas infested by blackberry the regrowth eucalypts are also targeted (J. Snape pers. comm). Although the herbicide is approved by NPWS, the **broad-scale application of Grazon Extra through the use of a vehicle-mounted, motorised pump and hose potentially poses a risk to retained shrubs and understorey/ground cover species and is not considered appropriate for use in partial clearing zones, where selective vegetation retention is required**. Refer to BMP 47 for further detail. Within the ECZ on the Project West, significant groundcover disturbance was observed. Specifically, the retention of managed shrub and groundcover vegetation appeared to be compromised due to extensive application of woodchip mulch, particularly between the western extent of the Project Area, west from Track 1 over an area of approximately 1.5km of the easement. Following the site audit inspection, a Post-clearing Vegetation Integrity Monitoring Report (LENECO, April 2025) was provided for review (due to the report being finalised outside the audit period, it will be subject to detailed review next audit). The report identified that from February to May 2024, vegetation clearing within the ECZ was initially undertaken using an excavator-mounted mulcher. During the earlier stages of this period, this method resulted in the removal of trees less than 200 mm DBH within tall shrubby forests associated with PCTs 300, 729, and 1196. Transgrid also advised that forestry mulchers were used during clearing but were restricted to clearing undertaken in Project Area West during March 2024, and were not used after this period due to their unsuitability for operation on steeper or undulating terrain. In particular, clearing activities conducted between the Switch yard and Track 1 over approx. 1.5km area of the easement produced an average mulch cover of approximately 95% (sighted), with mulch depths ranging from 10 to 20 cm (sighted). Such high levels of ground coverage are characteristic of forestry mulchers, which are designed to process entire trees and understorey vegetation into finely shredded mulch, often in a single pass. The extent and uniformity of mulch cover observed in this area appears to be the result of using a forestry mulcher rather than a standard excavator mulcher. It is not considered that a forestry mulcher is a similar machine or method for mulching when compared to the excavator-mounted mulcher which is the machine that was proposed for use under the BMP and BDAR. There are key operational differences between the two pieces of equipment: • Forestry mulchers are designed for full clearing, reducing both canopy and understorey vegetation into a uniform mulch layer across the entire surface area. They operate at a high processing rate, result in greater impacts to groundcover and soil and are indiscriminate leaving minimal vegetation intact. • Excavator mulchers, by contrast, are generally smaller, more precise, and better suited to selective or partial clearing. They can be operated in a way that retains groundcover and understorey vegetation. **Due to these functional differences and the observed outcomes, it is considered that forestry mulchers are not appropriate for partial clearing and their use is inconsistent with the approved clearing methods specified in the BMP. The forestry mulcher is not considered to be a similar machine to an excavator mulcher. This non-compliance specifically relates to clearing activities conducted west of Track 1 along the alignment toward the Maragle site. The method of clearing used in this area resulted in increased disturbance to shrubs and groundcover vegetation, contrary to the intended retention requirements of partial clearing.** **Furthermore, the application of mulch over much of the easement in this area and at such depth (10- 20 cm) has likely elevated ground temperatures, potentially degrading the soil seedbank. It is important to note that spreading mulch is not considered a form of rehabilitation and, in this case, may have had the opposite effect by impeding vegetation**

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
				recovery. The extent of the impacts observed have the potential to have resulted in environmental harm (as defined under the Infrastructure Approval). **In conclusion a combination of unapproved clearing methods (i.e., use of a forestry mulcher instead of an excavator mulcher) and poor mulch management has likely resulted in negative ecological outcomes (particularly in areas where partial clearing was required) and is inconsistent with the intent of the BMP.** **Lastly evidence of implementation of the following recommendations for improvement related to partial clearing from the last audit (Construction Audit 2) was not observed and could have improved the outcomes of the clearing through timely implementation of corrective actions where excessive deposition of woodchip mulch had occurred in the ECZ:** • **Rapid monitoring of partial clearing works once they have occurred** • **Consideration of whether any restrictions or amendments to mulch spreading rates or locations are required to support vegetation regeneration outcomes.** **Transgrid advised during Construction Audit 3that these recommendations were incorporated into an updated revision of the BMP (replacing Rev 0.13), which was submitted to CPHR, FCNSW, and NPWS for consultation on 12 August 2024. Feedback was received from NPWS on 28 August 2024 and from CPHR on 11 September 2024, both noting that further consultation would be required to address the proposed amendments relating to partial clearing. Further consultation was contingent upon the provision of the Post-clearing Vegetation Integrity Monitoring Report to support discussion. This was not completed during the audit period.** **Although Transgrid's intent to address the recommendations through a revised BMP was appropriate, the delay in submitting the Post-clearing Vegetation Integrity Monitoring Report which was required following three months of partial clearing monitoring (construction commencement) meant that corrective actions were developed too late to influence on-ground clearing practices. As vegetation clearing has now been completed, the practical value of incorporating these measures has been significantly reduced and remedial actions have been recommended.** **Recommendation: It is recommended that an independent ecological assessment be commissioned to verify whether environmental harm has occurred as a result of the identified impacts within the partial clearing areas between Track 1 and the Maragle Site. The assessment should:** • **Evaluate the extent of impacts to retained shrub and groundcover vegetation,** • **Determine whether the soil seedbank or other regeneration processes have been adversely impacted as a result of the heavy application of mulch,** • **Identify any potential ongoing risks to ecosystem recovery,** • **Review vegetation integrity scores and** • **Recommend appropriate remedial and corrective actions, including restoration of groundcover, removal or redistribution of excessive mulch, and review of vegetation management practices.** **The findings of the independent assessment should be documented in a written report and used to inform any necessary revisions to the BMP and associated clearing procedures to prevent recurrence.** **Recommendation: It is recommended that the ECZ areas west of Track 1 on the Project West site and any other areas (Project East and Project West sites) not meeting the long-term vegetation integrity targets at the completion of clearing be classified and mapped as heavily impacted due to impacts associated with deep cover of woodchip deposited during clearing operations. Heavily impacted areas should be subject to rehabilitation in accordance with the Rehabilitation Management Plan which is in preparation. Remedial works west of Track 1 on the Project West site are required to address the harm caused to managed shrub and groundcover vegetation zones. Remedial measures should include:** • **Reduction of woodchip cover and depth to expose soil for native plants to regenerate, this will need to be undertaken progressively and in a sensitive manner so that existing native vegetation is not removed and erosion and sediment control issues do not occur.**

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
				• **Monitoring and reporting on native plant regeneration for the ECZ area west of Track 1.** • **Direct seeding of collected seed and/or propagation and planting of plants from collected seed within the parts of the ECZ west of Track 1 (subject to further approval from FCNSW).** • **Monthly weed monitoring and monthly targeted weed control during the growth period for any weed infestations.** • **Installation of fauna friendly temporary exclusion fencing to prevent feral horses and deer from grazing on regenerating plants and transporting weeds into the ECZ area west of Track 1 (subject to further approval from FCNSW).** **Recommendation: It is recommended that Transgrid use a targeted application method for the use for Grazon Extra herbicide in partial clearing zones, to ensure targeted weed control is occurring and herbicide does not harm retained shrubs and other native vegetation. Foliar application of herbicide is considered to not be a suitable method for clearing or maintenance of broad areas of regrowth eucalypts in the ECZ. Monitoring of areas treated with broad application of Grazon Extra should be undertaken and where dieback of retained shrub and groundcover vegetation has occurred these areas should also be classified as heavily impacted areas and subject to rehabilitation in accordance with the Rehabilitation Management Plan which is in preparation.**
BMP5	Final design for permanent creek crossing structures on access roads will implement a design option to ensure stream flow is unaffected (e.g., single span to minimise stream disturbance and flow). These designs will be endorsed by NPWS, prior to the commencement of work.	NPWS Meeting Minutes dated 10/12/2024 NPWS Meeting Minutes dated 12/03/2025	Compliant	Confirmed during Construction Audit 2, the temporary and permanent design of Sheep Station Creek Bridge complies with all guidelines outlined by Condition B31 of the Infrastructure Approval. NPWS Meeting Minutes (sighted) identified that Sheep Station Bridge technical drawings were sent to NPWS, and works were to proceed 13 Jan 2025. The audit team was advised that the design had been approved by NPWS prior to the commencement of work. During the site audit inspection, it was observed construction had commenced on the final bridge.
BMP6	Design and micro-siting of access tracks will avoid and minimise impacts to rock outcrops, large boulders, piled rock, and rock features that provide potential sheltering and breeding habitat for fauna including threatened species and avoid mapped habitat trees. Access track corridors will be established with consideration to terrain (e.g., utilisation of the ridgelines to navigate to the higher elevations) to minimise cut / fill and vegetation clearing.		Compliant	Micro-siting had been generally driven by topographical constraints associated with the steep terrain. Some retained habitat trees were observed in the partial clearing zone which had crowns lopped. These trees are to be potentially retained but are subject to further hazard assessment (J. Snape pers. comm).
BMP7	Directional lighting will be used for any permanent lighting required (i.e., substation) to minimise light spill. Ensure lighting is not directed into vegetation and shields are used.		Compliant	No permanent lighting has been installed during the audit period. Works and lighting have been limited to approved construction hours (B. Toohey pers. comm).

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
Pre-construction				
BMP8	A Project Ecologist/s will be appointed prior to the commencement of construction.		Compliant	Peter Monsted from LENECO was the Project Ecologist for the Project during the audit period (B. Toohey pers. comm).
BMP9	A Soil and Water Management Plan (SWMP) will be prepared and implemented as part of the CEMP in consultation with NPWS and BCD. The plan will include stringent controls to mitigate impacts of runoff and sediment transfer from the Project area during construction and operation. Control measures will remain in-situ until site stabilisation completion criteria are met. The plan will ensure protection of aquatic habitat in the tributaries crossed by the Project, and particularly aimed at protecting the habitat for the Booroolong Frog associated with Yarrangobilly River. An Operational Management Plan for biodiversity will be prepared in consultation with BCD and NPWS and approved within 12 months of the commencement of construction. The CEMP will replicate the requirements detailed in the BMP for all safeguards/mitigation measures, particularly preclearing and clearing during construction (including B104-B108).	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	**Non-compliant**	**Implementation assessed as non-compliant.** During the audit period, **four rainfall events occurred that resulted in potential impacts to Booroolong Frog habitat due to sediment-laden water discharges**. These events are summarised below (further details refer to Condition B11): • 18 October 2024 – Turbid water discharge from Track 8 • 28–30 November 2024 – Turbid water discharges from Track 5 and Track 8 • 5 December 2024 – Turbid water discharges from Track 5 and Track 8 • 11 January 2025 – Turbid water discharge from Track 8 **Each event involved significant rainfall that overwhelmed erosion and sediment control measures, resulting in the discharge of turbid water into areas known to support Booroolong Frog habitat**. In accordance with the Trigger Action Response Plan, Stochastic monitoring was undertaken following the October 2024, November 20224, December 2024 and January 2025. As outlined in Section 4.4 of the Booroolong Frog Monitoring Program, NPWS was notified within the required two-hour timeframe following each incident with the exception of the 11 January incident. Transgrid became aware of the incident at 5:00pm, NPWS were notified at 8:20pm. During the site audit inspection, areas identified as Booroolong Frog habitat were inspected. In some locations, appropriate signage and rope barriers were in place to restrict access and protect sensitive areas. However, near Track 8—particularly in the vicinity of Wallace's Creek, where previous Booroolong Frog sightings have been recorded (J. Snape pers. comm), erosion and sediment control measures were also inspected and found to be ineffective along the creek edge (sediment fences installed along the creek edge were not properly embedded into the ground). It was unclear if the area was part of development area or under a joint management area. **Opportunity for Improvement: It is recommended that, in future instances where rainfall events may potentially impact Booroolong Frog habitat, Transgrid ensure NPWS is notified within two hours of identifying the risk. All such notifications should be recorded in a central register to ensure accountability and traceability.** **Recommendation: It is recommended erosion and sediment controls near Track 8 and Wallace's Creek should be properly installed and maintained to prevent runoff into the creek.** **Opportunity for Improvement: It is recommended that erosion and sediment controls near the Booroolong Frog habitat be included in both pre- and post-rainfall inspections for the development. This will help ensure the controls are functioning effectively and provide ongoing protection for the nearby Booroolong Frog habitat.**
BMP10	A seed collection methodology will be developed and implemented to assist with rehabilitation post construction. The methodology will include early collection of seeds onsite prior to clearing and other appropriate areas.	BMP (Rev. 13)	Compliant	A Seed Collection Method is contained in Appendix E of the BMP (Rev. 13).

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
Vegetation Clearing, Protection and Management				
BMP11	The boundary of the clearing limits for each clearing zone will be clearly marked on site by a surveyor in accordance with the Clearing Procedure before vegetation clearing commences. The edge of the clearing boundary will be marked with high visibility fencing and signage.	Visual observation.	**Non-compliant**	**During the audit, clearing activity within the eastern project alignment along Track 5C was observed to extend close to or potentially beyond the approved disturbance boundaries, with the audit inspection observing areas where clearing had occurred outside of installed pegs and red and blue ropes which were installed to demarcate the limit of clearing.** During the audit UGL and Transgrid noted that the pegs and ropes had been installed with conservative buffers in place. UGL engaged a surveyor to verify the boundaries along Track 5C on the 13 March 2025. The surveyor verified clearing was within the disturbance boundary noting that in this instance the ropes delineating the clearance limits had conservatively been place inside the actual limit of disturbance . **Despite this, the methodology used was inconsistent with BMP 11, which requires all clearing boundaries to be clearly delineated using high-visibility fencing and appropriate signage. Even if ropes were reportedly in short supply, the set exclusion zone boundaries were still crossed during clearing activities, undermining the intent of using flagging and delineation to protect sensitive areas. Additionally, blue ropes which are not the approved colour for marking exclusion zones were incorrectly used, creating further potential for confusion and non-compliance.** The 24hr pre-clearing checklists provided for Project East site also identified that there were some issues with ropes missing in this general area (T9 to T11). **Recommendation: It is recommended that, in future clearing activities, any deviations such as incorrect rope colours or inadequate boundary marking should be documented and addressed promptly. All delineation measures should be recorded in a central register to support traceability and compliance monitoring.**
BMP12	Exclusion Zones, or 'No-Go' zones, will be clearly marked at the edge of the total clearing zones and ECZs to protect the vegetation to be retained outside the Project from inadvertent direct impacts. Exclusion Zones will be marked by surveyor with high visibility fencing and signage.	Visual observation	**Non-compliant**	**Refer to findings and recommendations for BMP11 for details.**
BMP13	A 50 metre Exclusion Zone for the Booroolong Frog will be marked and clearly delineated from other survey markers with signage placed around the tributaries that flow downhill into the Yarrangobilly River, this includes the limits of clearing on the lower end of Sheep Station Creek, Cave Gully, Lick Hole Gully and Wallace Creek that are crossed by the Project to protect the downstream habitat of Booroolong Frog.	Visual observation	Compliant	Rope fencing and signage was observed during site audit inspection. Photographs of signage were also provided and sighted during the audit.
BMP14	The 50 metre Exclusion Zone adopted for the Main Works Project for the Booroolong Frog on Yarrangobilly River, will be retained for construction of the transmission line.	Visual observation	Compliant	Rope fencing and signage were observed during site audit inspection.
BMP15	Hazard trees identified from the LiDAR assessment are to be flagged for removal, and any other adjacent and important habitat trees and features, also identified for retention and to avoid disturbance during the felling activity should also be clearly marked, in accordance with the Clearing Procedure, and included in SEPs.	Visual observation UGL - Hazard Tree Photographs	Compliant – subject to ongoing assessment	Some trimming of hazard trees was observed during the site audit inspection; however, assessment of all hazard trees was ongoing at the time of the audit (B. Toohey pers. comm). No clearing occurred during the current audit period in the hazard tree zone (B. Toohey pers. comm).
BMP16	Implement clearing in accordance with the clearing protocol provided in Appendix B.		**Non-compliant**	Non-compliance related to the implementation of staged clearing requirements was also identified. A Fauna Habitat / Salvage Relocation Form from 15 March 2025 identified that a Sugar Glider was found after a habitat tree was required to be felled during Stage 1 clearing to facilitate critical construction of access track 5. The Clearing Supervision Form for Access Track 5 from T10 to T11 provided also identified that machine clearing in some parcels was not staged due to steep terrain. Both habitat and non-habitat trees were felled. Habitat trees were checked immediately after being felled with no presence of fauna. **Clearing on Track 5 was not fully compliant with the BMP Clearing Protocol requirements for staged clearing where habitat-bearing trees are identified.** **Recommendation: Prior approval should be sought for variations to staged-clearing requirements by relevant CHPR, NPWS, FCNSW and AG DCCEEW.**

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
BMP17	A qualified Project Ecologist will undertake the following at least 28 days prior to clearing: • Assessment of HBTS for Owls including: - Songmeters will be placed underneath a tree within the centre of an identified cluster of potential Masked Owl nest trees for a period of four weeks before planned clearing. The songmeters will be placed a maximum of 200 m apart within the Masked Owl threatened species habitat of the Project area. - Within the last two weeks of the songmeters monitoring, stagwatching will be undertaken targeting potential nest trees based on the results of the first two weeks of songmeters. Stagwatching will be undertaken an hour before dawn and an hour before and after dusk. If nesting owls are present, the tree is to be clearly marked as an Environmental Protection: No Go Zone (Exclusion Zone) and removal of the tree must be delayed until the chicks have fledged (10-12 weeks). There is to be no disturbance within 50 m of the tree, and fencing/ flagging will be established to demarcate this buffer. Disturbance between 50 – 100 m is to be minimised a far as reasonably practicable also. • Assessment of HBTS for Gang-gang Cockatoo including: - Songmeters will be placed underneath a tree within the centre of an identified cluster of potential Gang-gang Cockatoo nest trees for a period of four weeks before planned clearing. The songmeters will be placed a maximum of 200m apart within the Gang-gang Cockatoo threatened species habitat of the Project area - Within the last two weeks of the songmeters monitoring, stagwatching will be undertaken targeting potential nest trees based on the results of the first two weeks of songmeters. Stagwatching will be undertaken during the day for cockatoo activity. - If nesting birds are present, the tree is to be clearly marked an Exclusion Zone (buffer 100m of the tree) will be established, using high visibility fencing/ flagging removal of the tree must be delayed until the chicks have fledged (1012 weeks). Disturbance up to 200m from the tree is to be minimised as far as reasonably practicable.	LENECO Maragle East Tower 7, 8 & 9 Ecological Survey Report dated September 2024 Pre-construction ecological survey report - Maragle East, Towers 10 and 11 dated 29/11/2024	Compliant	Surveys were completed at least 28 days prior to clearing to ensure compliance with environmental requirements. During these surveys, the Masked Owl was recorded in multiple locations, including the Project East site between Towers 7 & 8, west of Tower 8, and at Towers 9 & 10, as well as at E03, E-09, and E-13. However, no potential roosting hollows were observed in the recorded areas. Additionally, no other target species were detected during the surveys.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
BMP18	A qualified Ecologist will undertake the following at least 14 days prior to clearing: • Delineation of clearing zones and Exclusion Zones. • Ensure any trees from the Transmission Structure Zone clearing area authorised for removal, that occur within proximity to the clearing limit boundary, are felled so they fall into the cleared zone. No vegetation felling or associated damage to vegetation from felling activities is to occur within Exclusion Zones. • Place Exclusion Zone high visibility fencing outside tree protection zones (see below "14 days before clearing" section for more detail). If the tree protection zone cannot be avoided during works, the Structural Root Zones (SRZ) of trees will be retained. Installation of Booroolong Frog Buffer • Delineation of Rocky Outcrop Avoidance Zones • The SEA and Project ecologist will commence the clearing permit process.	Visual Observation LENECO Maragle East Tower 7, 8 & 9 Ecological Survey Report dated September 2024 Pre-construction ecological survey report - Maragle East, Towers 10 and 11 dated 29/11/2024.	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
BMP19	A qualified Ecologist will undertake a pre-clearing inspection of the Project area at least 14 days prior to clearing. The ecologist will: • Physically mark any important habitat features with flagging/non-permanent spray paint suspected to be utilised by significant species in the area and record GPS coordinates of each biodiversity feature. Important habitat features include: - Large active stick nests - Hollow-bearing trees • HBTs with a diameter at breast height (DBH1) of >130cm that also contain dead wood / old branch stubs in the canopy shall be marked for 'limb by limb' (spray-painted 'LxL' or similar) removal treatment • HBTs that are smaller (trunk <130cm DBH, and / or do not contain dead wood / old branch stubs / or inaccessible by EWP in the canopy) shall be marked as 'Hollow Bearing' (spray-painted 'HBT' or similar) • If hollows are active at the time of inspection - Yellow-bellied Glider den trees and sap trees (i.e. presence of a v-notch) - Active nesting/breeding sites (dens, drays, nests etc.) - Threatened species habitat (as evidenced by scratchings, scats etc) - Unexpected threatened flora (in accordance with the Unexpected Threatened Species Finds Procedure). • Targeted searches will also be undertaken for weed species, to ground truth the extent of weed occurrences within the Project area. • Identify suitable fauna release locations outside the Project area. • Identify and surround trees for protection with exclusion fencing. This consists of flagging, bunting, nightline or other similarly robust and durable material with reflective strips periodically along its length, designated as "Environmental Protection Area" zones. • Contact will be made with the local vet and/or wildlife carer (contact details outlined in Appendix C) prior to the commencement of clearing works to ensure they are available in case fauna is found. Within Booroolong Frog habitat: • Any aquatic habitat features (rocks, logs) that are required to be removed will be salvaged for rehabilitation within riparian areas. Within Yellow-bellied Glider habitat: • Inspect den/sap trees to determine if live gliders are present - If gliders are present or likely to be present, the tree is to be clearly marked as an exclusion/ no-go zone and demarcated with fencing/ flagging. The removal of the tree must allow time for fauna to vacate of its own accord (as outlined in more detail below, i.e., a two staged process, clearing non-habitat vegetation first).	Visual Observation LENECO Maragle East Tower 7, 8 & 9 Ecological Survey Report dated September 2024 Pre-construction ecological survey report - Maragle East, Towers 10 and 11 dated 29/11/2024	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
BMP20	No more than 24 hours before clearing using the checklist attached as Appendix B, the following will occur: • Boundaries for construction, clearing and Exclusion Zones will be confirmed. • The Ecologist will check marked habitat trees and features within the works area are correctly marked. • Fauna relocation will take place, refer to Appendix C. • Booroolong Frog: o Any aquatic habitat features (rocks, logs) that are required to be removed will be salvaged for rehabilitation within riparian areas. • Yellow-bellied Glider habitat: o Inspect den/sap tress to determine if live gliders are present • If gliders are present or likely to be present, the tree is to be clearly marked as an exclusion/no-go zone and demarcated with fencing/flagging. The removal of the tree must allow time for fauna to vacate of its own accord (as outlined in more detail below, i.e., a two staged process, clearing nonhabitat vegetation first).	24hr Preclearing Checklist - E06, East ‣ West of Sheep Station Creek ‣ T10 to T11 dated 17/03/2025 24hr Preclearing Checklist – E04 dated 17/03/2025 24hr Preclearing Checklist – E08 dated 3/17/2025 24hr Preclearing Checklist – E18, East ‣ West of Sheep Station Creek ‣ Access Track 5 from T9 to T10 dated 12/03/2025 24hr Preclearing Checklist – E19, East ‣ West of Sheep Station Creek ‣ Access Track 5 from T9 to T10 dated 12/03/2025 24hr Preclearing Checklist – E05, East ‣ West of Sheep Station Creek ‣ T11 dated 11/03/2025	Compliant	Consistent with previous Construction Audits, NPWS and CHPR continue to receive pre-clearing reports (sighted). Preclearing reports were sighted and contained detailed information regarding the effort and observations related to pre-clearing surveys. During the audit, pre-clearing checklist forms were reviewed, along with a sample of records. **A review of these identified a number of inconsistencies**. Some were incomplete, lacking either an ecologist's or UGL's sign-off. **Opportunity for Improvement: It is recommended that reporting procedures for pre-clearance checklists be reviewed and improved to ensure consistency across reporting structures and improve clarity, accuracy, and compliance.**
BMP21	At the completion of the pre-clearing surveys a report will be compiled of all the data and activities completed during the pre-clearance surveys. The outcomes of the pre-clearing inspections will be reported to BCD, NPWS, FCNSW and DCCEW prior to the commencement of vegetation clearing. The report will include any recorded habitat features (including GPS data), fauna relocated or euthanised, including name of qualified/licensed handler, species, location notes, and release location and method.	CPHR, NPWS Pre-clearance Report Correspondence dated 03/02/2025CPHR, NPWS Pre-clearance Report Correspondence dated 29/11/2024	Compliant	Consistent with previous Construction Audits, NPWS and CPHR continue to receive pre-clearing reports (sighted). Preclearing reports were sighted and contained detailed information regarding the effort and observations related to pre-clearing surveys.
BMP22	The vegetation and habitat clearing methods within each zone of the Project area will be undertaken in accordance with the Clearing Procedure provided in Appendix B.		**Non-compliant**	Non-compliance related to the implementation of staged clearing requirements was identified. Refer to BMP 16 above.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
BMP23	Clearing will be undertaken as part of a single or two stage process: • Stage 1 clearing of non-habitat vegetation e.g., shrubs, regrowth, ground cover and non-habitat trees). Allow at least 24 hours for fauna to vacate habitat before removing habitat trees. • Stage 2 clearing of habitat vegetation (hollow-bearing trees, habitat trees, and bushrock) supervised by a qualified ecologist. - Habitat features marked as "HBT" will be mechanically shaken or 'nudged' prior to felling to encourage any remaining animals to either leave, or at least attempt to leave and therefore become visible, at which point observed by the Project Ecologist/a suitably qualified ecologist and safely captured and released elsewhere in accordance with the Fauna Rescue and Relocation Procedure (Appendix C). - Subsequent to felling, habitat trees marked as "HBT" will be systematically checked for any remaining fauna. If fauna is encountered, the Project Ecologist/a suitably qualified ecologist with experience in fauna handling should capture any animal that emerges, inspect for injuries and, if uninjured, relocate to predetermined fauna release area or if injured, referred to a vet or wildlife carer for treatment in accordance with the Rescue and Release Procedure (Appendix C of the BMP). - Trees marked as 'LxL,' to demarcate those trees which have multiple hollows and potential hollows in limbs, would be inspected by the Project Ecologist/ a suitably qualified ecologist via an elevated work platform (EWP) where possible. - Soft felling techniques are to be used for the sectional removal of habitat trees >130cm DBH. A range of measures can be applied, including the use of a mulching head and/or shears on an excavator to remove non-habitat limbs on standing trees. Such activity will be mindful that hollows and resident fauna will not be directly impacted by the operation. This will help minimise tracking in partially cleared areas, aide a safe clearing methodology, and create room for EWP access to hollow limbs for subsequent fauna detection and removal - Felled habitat trees will be left for a short time (1 – 2 hours) to allow any undetected fauna further opportunity to escape - Nests and on-ground logs will be carefully inspected by the Project Ecologist or a suitably qualified ecologist. Logs should be carefully rolled and inspected beneath the log. Any fauna species are to be relocated to habitat identified during the preclearing process or, if injured, transported to a veterinarian or wildlife carer. If nest boxes are deemed an appropriate mitigation measure by the Project Ecologist to utilise during fauna relocations, these will be established in consultation with Transgrid and BCD.	Visual Observation	**Non-compliant**	Non-compliance related to the implementation of staged clearing requirements was identified. Refer to BMP 16 above.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
BMP24	As far as possible, clearing will be planned to avoid times when hollow-dependent fauna is breeding, including: • Gang-gang Cockatoo – October to January • Masked Owl – May to August • Eastern Pygmy-possum – Spring to Autumn • Yellow-bellied Glider – November to May	LENECO Maragle East Tower 7, 8 & 9 Ecological Survey Report dated September 2024 Pre-construction ecological survey report - Maragle East, Towers 10 and 11 dated 29/11/2024	Compliant	Masked Owl was the only threatened species from this list recorded during the audit period. No suitable breeding hollows were observed. During the audit it was identified that there is heightened awareness for these species during these periods. However, it is generally not feasible to schedule clearing activities to avoid these periods due to significant seasonal overlap—except when works are paused.
BMP25	Hand clearing only will be used in *Caladenia montana* habitat.	Visual Observation	Compliant	Hand clearing zones were observed during the audit site inspection.
BMP26	A qualified ecologist or will be present during all clearing operations to record any tree hollows not identified during the pre-clearing survey, and to rescue any animals disturbed by clearing.	Clearing supervision forms (Form 10) for Project Area East - Track 5 from T9 to T10 x 3 forms - Track 5 to Sheep Station Creek East - West of Sheep Station Creek T10 to T11 x 3 forms - West of Sheep Station Creek T11	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
BMP27	Records are to be kept of all fauna rescue events including locations to where fauna have been relocated. Provide GPS coordinates for such events.	Fauna Rescue & Event Record (Antechinus - E-05) dated 21/02/2025 Fauna Rescue & Event Record (Antechinus - E-07) dated 09/02/2025 Fauna Rescue & Event Record (Sugar Glider - E-07) dated 09/02/2025 Fauna Rescue & Event Record (Microbat - E-13) dated 09/02/2025 Fauna Rescue & Event Record (Crayfish - E-08) dated 08/02/2025	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
BMP28	Hollows logs and limbs encountered during clearing will be retained (not piled) for placement within adjacent vegetation or on the maintained easement within shrub retention areas.	Visual Observation Timber License LIC000203	Compliant	During the site inspection, stockpiles of timber were observed across both Project East and Project West areas. Transgrid advised that any timber located within Kosciuszko National Park land cannot be removed from the site. In areas located within the Bago State Forest, the Project has received approval from FCNSW to remove up to 2,000 tonnes of residual logs and 220 tonnes of residual mulch.
BMP29	Any felled timber within Bago State Forest that FCNSW determine can be repurposed will be removed off-site by FCNSW.		Compliant	It was advised by UGL that FCNSW have salvaged some timber from the Bago State Forest. It was noted that some stockpiles of timber remain in Project Area West.
BMP30	Post clearing report will be prepared outlining the process of habitat removal, records of fauna that had to be handled or relocated, final clearing extent using GPS.		Compliant	Evidence of fauna handling records and clearing extent for the audit period using GIS and drone imagery has been reviewed, however it has not yet been presented in a post clearing report. UGL has advised that mainline clearing was completed in March 2025 and the BAM Accredited Ecologist completed post clearing vegetation integrity plots in the final clearing areas in March 2025. The post clearing report was in preparation at the time of the audit. .
BMP31	No stockpiling or storage of equipment and machinery will occur: • Within dripline of any mature trees • Within 50m of riparian buffers or vegetation • Outside of the total clearing zone	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
BMP32	Pruning of mature trees is to be in accordance with Part 5 of the Australian Standard 4373-2007 Pruning of amenity trees.	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
BMP33	Use existing tracks where possible and previously cleared and disturbed areas for access purposes.	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
BMP34	All machinery will be free from any fuel and other pollutant residues, with connections and hoses inspected regularly.	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
Wildlife Protection				
BMP35	Where fauna is encountered that requires handling or rescue, follow the Fauna Rescue and Release Procedure in Appendix C.	Fauna Rescue & Event Record (Antechinus - E-05) dated 21/02/2025 Fauna Rescue & Event Record (Antechinus - E-07) dated 09/02/2025 Fauna Rescue & Event Record (Sugar Glider - E-07) dated 09/02/2025 Fauna Rescue & Event Record (Microbat - E-13) dated 09/02/2025 Fauna Rescue & Event Record (Crayfish - E-08) dated 08/02/2025	Compliant	The evidence collected during the audit period satisfies the requirements of this management measure.
BMP36	Clearance of construction areas prior to commencement of daily clearing activities will occur to ensure there is no wildlife present. This will involve an on-foot pre-clearing survey by a suitably qualified ecologist.		Compliant	Pre-clearing surveys are conducted prior to the commencement of daily clearing activities (B. Toohey pers. comm).
BMP37	A daily drive through sweep of areas planned for construction, by the contractors' environmental representatives, will occur during general construction activities. If an animal is located within the construction area during works, the Delivery Manager and Project Management Site Representative are to be notified immediately. All work must immediately cease within the immediate area of the find and a local wildlife rescue, or an ecologist will be required for assistance where necessary.	Daily site diary	Compliant	Daily site diary entries identify the completion of inspections of active construction areas for fauna.
BMP38	Vehicle movements on newly formed access tracks will be limited to a 20 km/h speed limit implemented to reduce the risk of vehicle strike to fauna.	Visual Observation	Compliant	During the site audit inspection speed signs were observed during the site audit inspection.
Bmp39	Artificial lighting required during construction in the early morning and late afternoon in winter will be limited to within approved construction hours.		Compliant	Construction activities have only been undertaken during nominated construction hours (B. Toohey pers comm).
BMP40	Fauna strike space – when towers are standing, monitoring in the form of weekly inspections will occur via walked tower to tower transects to identify collision issues and identify any collision occurrences. Where collisions are identified, this would trigger installation of additional control measures including increased monitoring and installation of additional reflectors.		Not-triggered	

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
Aquatic Habitats				
BMP41	Watercourse crossings will be designed to minimise impacts on hydrology, aquatic habitat and fauna by: • Maintaining low-flow conditions and not blocking fish passage • Being designed with consideration of the potential for flooding during construction • Be removed and the area rehabilitated following completion of construction.		Compliant	Confirmed during Construction Audit 2, the temporary and permanent design of Sheep Station Creek Bridge complies with all guidelines outlined by Condition B31 of the Infrastructure Approval including Policy and Guidelines for Fish Habitat Conservation (DPI, 2013) and Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (NSW Fisheries, 2003).
BMP42	Retain stumps in riparian zones and aquatic habitats where practicable to reduce the potential for bank erosion. Even dead stumps and root systems may act to reduce erosion during construction and operation periods. If stump treatment with poison is required, appropriate treatment will be determined in consultation with NPWS or FCNSW (dependent on location).	Visual Observation	Compliant	The evidence collected during the audit period satisfies the requirements of this condition.
BMP43	Activities in aquatic habitats and riparian zones will be avoided, excluding approved works at Sheep Station Creek.	Visual Observation	Compliant	No construction activities have been undertaken within riparian zones during the audit period (J. Snape pers. comm)
BMP44	Keeping vehicles and machinery away from the banks of a waterway where possible. Where machinery must enter the waterway ensure that they are cleaned, degreased and serviced prior to entering.	Visual Observation	Compliant	No vehicles or machinery were observed near any banks of water during the site audit inspection. .
BMP45	Removal of all temporary works, flow diversion barriers and sediment control barriers within aquatic habitats as soon as practicable and in a manner that does not promote future channel erosion.		Not-triggered	

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
Unexpected Threatened Species				
BMP46	Where threatened species are unexpectedly identified during pre-construction, or construction, follow the Unexpected Threatened Species Procedure in Appendix D.	General Correspondence from UGL RE: Notification of Scarlet Robin Nest Discovery and Buffer Zone Implementation for Track 5 Clearing dated 10/11/2024 Fauna Rescue & Event Record (Crayfish - E-08) dated 08/02/2025	**Non-compliant**	<u>Scarlet Robin</u> A nesting Scarlet Robin was identified under Threatened Species Unexpected Finds for the audit period. Notification was provided to Transgrid on 10 November 2024, which identified that the find was not unexpected. Suitable protective measures were implemented to protect the nest while it was being actively used. The handling of this find has not triggered a non-compliance. <u>Unidentified Spiny Crayfish Species</u> A spiny crayfish species was reported from in clearing area E-08 on 8 February 2025. The crayfish was relocated upstream to minimise disturbance from clearing activities, however**, the exact species was not identified at the time**. Given the recorded history of the threatened species of crayfish including the Spiny Alpine Crayfish (*Euastacus crassus*) and Murray Crayfish (*Euastacus armatus*) occurring in the locality, further identification should have been sought. In response to these findings, Transgrid have since engaged SLR to identify the species. The crayfish has been identified as the North-Eastern Burrowing Crayfish (*Engaeus cymus*), which is not classified as a threatened species. The respective fulcrum record has been updated to reflect the correct species identification (J. Snape pers. comm). <u>*Caladenia montana*</u> This species was identified during surveys completed in late 2020, following a bushfire in January 2020, noting that difficulties with formal identification of the species by the Australian National Botanic Gardens in Canberra is documented in the Amended BDAR. The Amended BDAR identifies that this species was assessed based on plant clusters which were recorded, varying from 1 to 12 plants. The species polygon for offsetting purposes was drafted with a 30 metre buffer drawn around each cluster of plants. The BDAR identified that the creation of a species polygon based on PCT, and vegetation zone was inappropriate due to most terrestrial orchid species being constrained by the presence of a particular mycorrhizal fungi species in the soil. The species polygon generated using the 30 metre buffer was calculated at 18.6 ha and refined to 9.35 ha when clipped to the disturbance footprint. During pre-clearing surveys**, additional *Caladenia montana* specimens were located outside of the species polygon areas assessed in the final BDAR**. As a result of the findings of this audit, Transgrid have advised that EMM Consulting have been engaged to evaluate the field-verified records of *Caladenia montana* located outside the mapped species polygons assessed in the BDAR, to determine whether the development has resulted in impacts exceeding the approved 9.35 ha of habitat (J. Snape pers. comm). The outcome of this assessment will be subject to review during the next audit. The Unexpected Threatened Species Find Procedure identifies that the procedure is relevant to unexpected encounters of threatened species during construction activities (such as, but not limited to, breeding locations for the Masked Owl and Gang-Gang Cockatoo which are listed in the Procedure in Appendix D of the BMP). Table 2.2 of the BMP also identifies that any threatened species found in a location previously unknown during construction or operation must be immediately notified to NPWS, as per the mitigation measure BIO7 of the final BDAR. It is acknowledged that *Caladenia concolor* was initially reported as a potential unexpected threatened species find; however, no verifiable evidence was provided to confirm the identification, nor to demonstrate whether relevant stakeholders were notified of the corrected identification as *Caladenia montana*. Although *Caladenia montana* is listed in the BDAR and considered likely to occur within the Project Area, **the audit considers the find as "unexpected" because it occurred outside the areas mapped for this species in the BDAR**. **Recommendation: It is recommended that further assessment of the current known extent of *Caladenia montana* is undertaken to demonstrate that no more than 9.35 ha of habitat for this species will be cleared for the development or seek approval for additional clearing of habitat.** **Recommendation: It is recommended that all steps of the Unexpected Threatened Species Procedure should be followed and the relevant requirements implemented for the observations of *Caladenia montana* outside of the mapped species polygon assessed in the final BDAR, including notifying all relevant stakeholders and authorities in accordance with regulatory requirements.**

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
Weeds, Pathogens And Pests				
BMP47	Follow the Weed and Pathogen Control and Monitoring Procedure in Appendix H to prevent or minimise spread of weeds and pathogens	Weed mapping for towers 9 to 11. UGL Weed Spraying Register for spray events between 22/03/24 to 13/02/25 Visual observation of washdown stations and restricted areas.	**Non-compliant**	<u>Weed Control</u> Weed mapping is required to be undertaken during initial pre-clearance surveys and revised bi-annually within and adjacent to the Project area, including a 50-metre buffer, as outlined in Section 6.2 of the Weed and Pathogen Control Monitoring Program. This includes updating the mapping after each monitoring period to incorporate newly affected areas and to assess the effectiveness of applied management measures. It is acknowledged that in the previous audit, weed mapping was provided for the Project, with the exception of Towers 9–11 due to site inaccessibility. During this audit, weed mapping for the Project East including Towers 9–11, was reviewed. However, no verifiable evidence was provided to demonstrate that weed mapping for the remainder of the Project area has been monitored and updated as required. However it was noted that these reports are in progress and will be made available during the next audit. In reference to Appendix H of the BMP states that "broad-spectrum, non-specific weed treatments are potentially problematic in areas where weed species occur in conjunction with native plants**." During the site inspection active weed spraying was observed on Track 6. Contractors were observed broadly applying Grazon Extra herbicide using a vehicle-mounted, motorised pump and hose. The broad-scale application of Grazon Extra presents a risk to retained shrubs and broad-leaved native species and is not considered appropriate for use in partial clearing zones**, where selective vegetation retention is required. While Transgrid has indicated that contractors actively avoid applying herbicide within partially cleared zones and focus only on targeted weed infestations, this was not consistent with observations made during the audit. Furthermore, Transgrid have advised of an informal agreement between the Environmental Manager and weed control contractors which reportedly allows for the opportunistic spraying of post-clearing regrowth of tall-growing native eucalypt species (i.e. those potentially exceeding four metres in height) in areas comprising of blackberry monoculture as part of ongoing weed control activities. **This method, however, is not documented or approved in the BMP and therefore does not represent an authorised approach to clearing or managing native vegetation**. Additionally, in Project West, areas where deep mulch cover has resulted from the works, were observed to be supporting emerging weed growth. Targeted weed management in these areas is required to prevent further colonisation by weed species. As part of the audit, the Weed Spray Register was reviewed. It was noted that one spraying activity was recorded as having occurred during wind speeds of up to 35 km/hr. Such conditions significantly increase the risk of spray drift, potentially resulting in unintended impacts to non-target and surrounding vegetation. The register did not include specific details regarding the type of spraying undertaken during this activity. However, Transgrid advised that the activity involved ground-based spraying, and therefore considered that the wind speed limit was not applicable in this instance. In summary, the use of unapproved vegetation management practices and lack of alignment with BMP requirements raise concerns regarding compliance with approved procedures. **Opportunity for Improvement: It is recommended that the weed spraying register be updated to include details of spraying methodologies (including the adoption of backpack sprayers only in areas of partial clearing/where retained vegetation is required), observations of surrounding vegetation, justification for weather-related decisions, and photographic evidence where practical.** <u>Pathogen Control</u> Dieback of *Banksia canei* was observed during the audit site inspection. **Recommendation: Implement restricted access and hygiene measures in areas experiencing dieback of Banksia canei until further soil testing is undertaken. Notify NPWS, CHPR and FCNSW regarding soil testing and undertake mapping and adaptive management as necessary to comply with the BMP.**

Biodiversity Management Plan Snowy 2.0 Transmission Connection Project (rev 0.13)				
Management Measure.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Findings and Recommendations**
BMP48	All plant and equipment arriving to site will be clean of weed and seed material and be accompanied by a Weed Hygiene Declaration as included in Appendix H.	Weed and Pathogen Declaration Record – Toyota Hilux (Light Vehicle) dated 8/10/2024 Weed and Pathogen Declaration Record – Moxy Water Cart dated 11/03/2025	Compliant	All plant onsite is accompanied by a Weed And Pathogen Hygiene Declaration Record providing evidence that the plant has been cleaned and inspected ensuring it has been kept free of weeds, seeds and pathogens. Between September 2024 and March 2025, a total of 102 declarations have been received (J. Snape pers. comm). A completed Weed and Pathogen Declaration Record for a Water Cart dated 11 March 2025 and a Toyota Hilux dated 8 October 2024 was sighted during the audit.
BMP49	Implement Pest and Predator Monitoring Program in Appendix I.	SLR Pest and Predator Data and Monitoring Report – Quarter 4 dated 26/02/2025	Compliant	Pest monitoring continued throughout the audit period. The Quarter 4 2024 Pest Monitoring Report was reviewed, revealing a high frequency of feral horse detections across the Project West site. Deer were also frequently detected at six monitoring locations within the same area. During the site inspection, feral horses were observed throughout the Project West site, further corroborating the findings of the monitoring report. In contrast, at the Lobs Hole (East), pest species such as deer and red foxes were recorded but in low abundance.
BMP50	Personal waste / refuse generated during construction will be stored appropriately in inaccessible bins and disposed at appropriate waste disposal facilities off-site.	Visual Observation	Compliant	During the inspection, the Maragle Project Construction Compound and Lobs Hole were observed to be well maintained, with general housekeeping practices effectively implemented, keeping the area free of litter.
Rehabilitation				
BMP51	Disturbed areas are to be progressively stabilised to prevent erosion and weed establishment	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	**Non-compliant**	**Refer to mitigation measure W3 in the Amendment Report Mitigation Measures for findings and recommendation details.**
BMP52	Implement Rehabilitation Plan	DPHI Extension Request Approval Letter dated 06/11/2024 DPHI Portal Post Approval Form - RMP dated 03/02/2025	Not triggered	An extension was sought during the audit period to extend the submission date of the RMP. The Planning Secretary approved this extension request on the 06 November 2024 extending the submission date to the 04 April 2025. The RMP was submitted to the Planning Secretary for approval on the 03 February 2025. At the time of the audit the RMP was pending approval (J. Snape pers. comm).

<table>
<tr><th colspan="5">Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)</th></tr>
<tr><th>Condition No.</th><th>Requirement</th><th>Evidence Collected</th><th>Compliance Status</th><th>Independent Audit Findings and Recommendations</th><th>Unique ID on NC</th></tr>
<tr><td colspan="6">Part A – Conditions Specific to Action</td></tr>
<tr><td>1</td><td>To minimise the impacts of the action on protected matters, the approval holder must:
a. not clear more than:
(i) 1.67 ha of habitat for Booroolong Frog; and
(ii) 118.34 ha of habitat for Spot-tailed Quoll; and
b. minimise the impacts of the Action on hollow-bearing trees.</td><td>Biodiversity Management Plan (rev 0.13) dated 30/10/2024
UGL Clearing Progress Summary dated 21/03/2025</td><td>Compliant</td><td>a. Clearing commenced on the 08 March 2024 which occurred outside the audit period however clearing activities were undertaken during this audit period. Extent of clearing of Spotted Quoll and Booroolong frog habitat is summarised in the table below.
Table 1: Extent of Clearing<table><tr><th>Species</th><th>Extent of Clearing</th></tr><tr><td>Booroolong Frog</td><td>0.93 ha</td></tr><tr><td>Spot-tailed Quoll</td><td>96.17 ha</td></tr></table>Clearing is within approved limits.
b. Implementation of impact minimisation for hollow bearing trees was discussed and observed during the audit inspection.</td><td></td></tr>
<tr><td>2</td><td>The approval holder must not clear outside the project area.</td><td></td><td>Compliant</td><td>No clearing outside the clearing areas was detected or notified to the Transgrid during this audit period (J. Snape pers. comm).</td><td></td></tr>
<tr><td>3</td><td>To mitigate impacts on protected matters, the approval holder must implement conditions B21, B41 and C1 of the State Infrastructure Approval, in so far as they relate to monitoring, mitigating and avoiding impacts to protected matters.</td><td>Biodiversity Management Plan (rev 0.13) dated 30/10/2024
Environmental Management Strategy (rev 0.08) dated 5/08/2024</td><td>Non-compliant</td><td>Condition B21 was triggered non-compliant due to a number of non-compliances with the BMP. A detailed review and findings are presented in the BMP Management Measures Compliance Table (refer Table 2 in Appendix 4).The audit has identified
Condition B41 is compliant.
Condition C1 is compliant.</td><td>NC-10</td></tr>
<tr><td>4</td><td>The Biodiversity Management Plan required under condition B21 of the State Infrastructure Approval must:
a. be consistent with relevant statutory documents;
b. demonstrate how the approval holder will minimise erosion and control sediment generation;
c. demonstrate how the approval holder will take all reasonable and feasible measures to prevent any discharge to waters;
d. in respect of all watercourses which contain habitat for Booroolong Frog, as indicated by the areas within the yellow polygons designated ‘Booroolong Frog’ within the designated ‘Study area’ in the map at Attachment B, specify:
(i) what and how detailed baseline data on surface water flows and quality will be collected prior to the commencement of the Action; and
(ii) a program to augment data regarding surface water flows and quality data over time;
e. specify detailed criteria for determining surface water impacts (in respect of flows, quality and flooding) of the Action on the Booroolong Frog, including criteria for triggering remedial action (if necessary);
f. specify a monitoring program capable of detecting any specified criteria for triggering remedial action, if they occur; and
g. include a description of the measures that will be implemented to minimise the surface water impacts of the Action on the Booroolong Frog.</td><td>Biodiversity Management Plan (rev 0.13) dated 30/10/2024</td><td>Compliant</td><td>a. BMP has been prepared in accordance with
b. Included in Section 5.8 of the BMP
c. Included in Section 5.8 of the BMP
d.
(i) Methodology provided in BMP Appendix G - Table 4-2
(ii) BMP refers to SWMP
e. Detailed criteria for determining surface water impacts (in respect of flows, quality and flooding) of the Action on Booroolong Frog is to be included in the revised BMP (pending consultation and approval).
f. A monitoring program capable of detecting any specified criteria for triggering remedial action is to be included in the revised BMP (pending consultation and approval).
g. Mitigation measures specific to the Booroolong Frog contained in BMP Appendix G Table 4-1.

Changes to the BMP to reflect recommendations in previous audits is still subject to ongoing consultation and subsequent approval (J. Snape pers. comm).</td><td></td></tr>
<tr><td>5</td><td>The approval holder must submit the Biodiversity Management Plan and Environmental Management Strategy required by conditions B21 and C1 of the State Infrastructure Approval to the department for the Minister’s approval before they are approved by the NSW Planning Secretary.</td><td></td><td>Not applicable</td><td></td><td></td></tr>
<tr><td>6</td><td>The approval holder must implement the Biodiversity Management Plan and Environmental Management Strategy approved by the Minister until the end date of this approval, unless otherwise agreed by the Minister in writing.</td><td>Biodiversity Management Plan (rev 0.13) dated 30/10/2024</td><td>Non-compliant</td><td>Implementation of the BMP has commenced and is ongoing however a number of non-compliances have been identified with the BMP. A detailed review and findings is presented in the BMP Management Measures Compliance Table (refer Table 2 in Appendix 4).</td><td>NC-11</td></tr>
<tr><td>7</td><td>To offset the impacts of the Action on protected matters, the approval holder must implement conditions B18, B19 and B20 of the State Infrastructure Approval.</td><td></td><td>Not applicable</td><td>Compliant with Condition B18, B19 and B20 of the State Infrastructure approval.</td><td></td></tr>
</table>

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
8	The approval holder must notify the department in writing within 10 business days of making a biodiversity offset payment to the NSW National Parks and Wildlife Service. Each notification must state the date of payment, the amount paid, and the component of the biodiversity offset obligations in respect of which the payment is made.		Compliant	Confirmed during the Initial Construction Audit payment was made by Snowy Hydro Limited on behalf of Transgrid to NPWS on the 31 August 2023.	
Submission and Publication of Plans					
9	The approval holder must submit all plans required by these conditions electronically to the department.	Revised EMS and BMP Submission Correspondence dated 16/12/2024	Compliant	Confirmed during the Initial Construction Audit the EMS and BMP were sent and approved by the Department. During this audit period a revised EMS and BMP to reflect Stage 2 Works was sent to the Department on the 16 December 2024.	
10	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: a. the plan is approved by Secretary of the NSW Department of Planning and Environment as required under a state/territory government condition which must be complied with in accordance with these EPBC Act conditions.	Project Webpage (sighted 6/03/2025)	Compliant	Consistent with previous Construction Audits management plans are available and accessible on the project website (sighted). https://www.lumea.com.au/projects/snowy-2-0-transmission-connection-project/#environmental-documentation	
11	The approval holder must keep all published plans required by these conditions on the website until the expiry date of this approval.	Project Webpage (sighted 6/03/2025)	Compliant	Refer to Condition 10.	
12	The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public.		Not applicable	Confirmed during the Initial Construction Audit data has already been made publicly available by the NSW Government on the Major Projects webpage.	
13	If sensitive ecological data is excluded or redacted from a plan in accordance with condition 12, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.		Not applicable		
Part B – Administrative Conditions					
Notification of Date of Commencement of Action					
14	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days of commencement of the Action.		Not applicable	Confirmed during the Initial Construction Audit AG DCCEEW were notified of the commencement of construction within 5 business days.	
15	If the commencement of the Action does not occur within 5 years from the date of this approval, then the approval holder must not commence the Action without the prior written agreement of the Minister.		Not applicable	Action has commenced within 5 years of this approval	
Compliance Records					
16	The approval holder must maintain accurate and complete compliance records.	Summary_DCR_All_Plans Register	Compliant	Transgrid utilise compliance tracking systems and excel registers/spreadsheets (sighted) to ensure they meet the specific performance measures and criteria set out by this approval.	
17	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request. *Note: Compliance records may be subject to audit by the department, or by an independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the department's website or through the general media.*		Not triggered	No requests were received during the audit period (J. Snape pers. comm).	
18	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guidelines for biological survey and mapped data (2018), or any subsequent official version or as otherwise specified by the Minister in writing.		Compliant	All plans prepared in accordance with the department's Guidelines for biological survey and mapped data (2018) and Guide to providing maps and boundary data for EPBC Act projects (2021).	

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
19	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the department's Guide to providing maps and boundary data for EPBC Act projects (2021), or any subsequent official version or as otherwise specified by the Minister in writing.		Compliant	All plans are generally prepared in accordance with the department's Guidelines for biological survey and mapped data (2018) and Guide to providing maps and boundary data for EPBC Act projects (2021).	
20	The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 12 months of the commencement of the Action.		Not triggered		
Annual Compliance Reporting					
21	The approval holder must prepare a compliance report for each 12-month period following the date of this approval, or as otherwise agreed to in writing by the Minister.	EPBC 2018/8363 – Snowy 2.0 Transmission Connection Project Annual Compliance Report dated 17/01/2025	Compliant	A compliance report was prepared on the 10 January 2024 and submitted to AG DCCEEW on the 15 January 2024 covering the time period from 21 October 2023 to 21 October 2024.	
22	Each compliance report must be consistent with the department's Annual Compliance Report Guidelines (2014), or any subsequent official version.	EPBC 2018/8363 – Snowy 2.0 Transmission Connection Project Annual Compliance Report dated 17/01/2025	Compliant	The 2023/24 Compliance Report is consistent . consistent with the department's Annual Compliance Report Guidelines (2014)	
23	Each compliance report must include: a. Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents. b. One or more shapefile showing all clearing of any protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared. c. A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.	EPBC 2018/8363 – Snowy 2.0 Transmission Connection Project Annual Compliance Report dated 17/01/2025 EPBC Annual Compliance Report Submission Correspondence dated 17/01/2025	Compliant	The EPBC Annual Compliance Report alongside the relevant shapefiles was submitted to the Department on the 17 January 2025.	
24	The approval holder must: a. Publish each compliance report on the website within 60 business days following the end of the 12-month period for which that compliance report is required. b. Notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website. c. Provide the weblink for the compliance report in the notification to the department. d. Keep all published compliance reports required by these conditions on the website until the expiry date of this approval. e. Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public. f. If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website. *Note: Compliance reports may be published on the department's website.*	EPBC Annual Compliance Report Submission Correspondence dated 17/01/2025 EPBC Annual Compliance Report Website Correspondence dated 23/01/2025	Compliant	An email notifying the Department of the preparation of the second EPBC Compliance Report was sent on 17 January (sighted). A follow-up email was sent on 24 January (sighted), advising that the report had been published on the project website; however, this email predated the actual publication of the report. A link to the website was also provided in the email.	

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Reporting Non-compliance					
25	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.		Compliant	During the audit period, six rainfall events occurred that resulted in sediment-laden water discharges. All six incidents were reported to the department within two days of becoming aware. For further detail refer to Condition C7 of the Infrastructure Approval Tables.	
26	The approval holder must specify in the notification: a. Any condition or commitment made in a plan which has been or may have been breached. b. A short description of the incident and/or potential non-compliance and/or actual noncompliance. c. The location (including co-ordinates), date, and time of the incident and/or potential non-compliance and/or actual non-compliance. *Note: If the exact information cannot be provided, the approval holder must provide the best information available.*		Compliant	All notifications included the requirements of condition 26.	
27	The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify: a. Any corrective action or investigation which the approval holder has already taken. b. The potential impacts of the incident and/or non-compliance and/or non-compliance. c. The method and timing of any corrective action that will be undertaken by the approval holder.		Compliant	All six incidents during the audit period were followed by the submission of detailed reports to the department within the required 12 business days. For further detail refer to Condition C7 of the Infrastructure Approval Tables.	
Independent Audit					
28	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every five-year period following the commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.		Not triggered	An independent audit of compliance was not triggered during the audit period.	
29	For each independent audit, the approval holder must: a. Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit. b. Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department. c. Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department. d. Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report. e. Keep every audit report published on the website until this approval expires.		Not triggered	Refer to Condition 29.	
30	Each audit report must report for the five-year period preceding that audit report.		Not triggered	Refer to Condition 29.	
31	Each audit report must be completed to the satisfaction of the Minister and be consistent with the department's Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines (2019), or any subsequent official version.		Not triggered	Refer to Condition 29.	

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Completion of an Action					
32	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.		Not triggered		
33	Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data.		Not triggered	Construction activities were ongoing throughout the audit period.	
Change to State Infrastructure Development					
34	The approval holder must notify the department in writing of any proposed change to the State Infrastructure Approval that may relate to protected matters within 2 business days of formally proposing a change and within 5 business days of becoming aware of any proposed change.		Not triggered	No proposed changes to the State Infrastructure Approval occurred during this audit period.	
35	The approval holder must notify the department in writing of any change to the State Infrastructure Approval conditions that may relate to protected matters, within 10 business days of a change to conditions being finalised.		Not triggered	See Condition 34 for details.	
Revision of Management Plans					
36	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.		Not triggered	No management plans have been approved by the department during the audit period.	
37	The approval holder may choose to revise an action management plan approved by the Minister under condition 5 or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the Action in accordance with the RAMP would not be likely to have a new or increased impact.	Revised EMS and BMP Submission Correspondence dated 16/12/2024	Compliant	During the audit period, Transgrid submitted revised versions of the EMS and BMP to the Minister in accordance with Section 143A of the EPBC Act. These revised documents relate to Stage 2 works and were submitted on the basis that the proposed changes would not result in a new or increased impact.	
38	If the approval holder makes the choice under condition 37 to revise an action management plan without submitting it for approval, the approval holder must: a. Notify the department electronically that the approved action management plan has been revised and provide the department with: (i) an electronic copy of the RAMP; (ii) an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP; (iii) an explanation of the differences between the approved Action management plan and the RAMP; (iv) the reasons the approval holder considers that taking the Action in accordance with the RAMP would not be likely to have a new or increased impact; and (v) written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the department. b. Subject to condition 40, implement the RAMP from the RAMP implementation date.	Revised EMS and BMP Submission Correspondence dated 16/12/2024	Compliant	The BMP (rev 0.13) and EMS (rev 0.08) was sent to the department on the 16 December 2024. The BMP and EMS address the requirements from I to v of Condition 38.	
39	The approval holder may revoke its choice to implement a RAMP under condition 37 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 37, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 37.		Not triggered		

Snowy 2.0 Transmission Connection Project (EPBC 2018/8363)					
Condition No.	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
40	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the Action in accordance with the RAMP would be likely to have a new or increased impact, then: a. Condition 37 does not apply, or ceases to apply, in relation to the RAMP. b. The approval holder must implement the action management plan specified by the Minister in the notice.		Not triggered		
41	At the time of giving the notice under condition 40, the Minister may also notify that for a specified period of time, condition 37 does not apply for one or more specified Action management plans. Note: Conditions 37, 38, 39 and 40 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised Action management plan, at any time, to the Minister for approval.		Not triggered		

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Construction Environmental Management					
	The management of environmental impacts during construction would be documented in the CEMP. The CEMP would provide a centralised mechanism through which all potential construction-related environmental impacts will be managed. It would also provide the overall framework for the system and procedures to ensure that environmental impacts are minimised, and that legislative and approval requirements are fulfilled.		Compliant	Confirmed during the Initial Construction Audit, management of environmental impacts during construction are documented within the 'Aspects and impacts register' included as Appendix G of the Construction Environmental Management Plan (CEMP).	
	The CEMP would include: • TransGrid's and the Contractor's environmental policy, objectives, and performance targets for construction • Reference to all relevant statutory and other obligations, including consents, licenses and approvals • Management policies, procedures, and review processes to assess the implementation of mitigation measures and the environmental performance of the project against the objective and targets ○ Requirements and guidelines for management in accordance with ○ The mitigation measures specified in this EIS • Requirements in relation to incorporating and implementing mitigation measures and emergency response procedures • Roles and responsibilities of all personnel and contractors to be employed on site • Incident and contingency management procedures • Procedures for complaints handling and ongoing communication with the community • Monitoring and auditing program, as defined by this EIS and the conditions of the approval.		Compliant	Confirmed during the Initial Construction Audit, a CEMP has been prepared for the development.	
	The CEMP would comprise a main CEMP document, issue-specific sub-plans, activity-specific procedures and strategies, and site-based control maps as relevant. These include: • Rehabilitation plan • Spoil management plan • Construction traffic management plan (CTMP) • Biodiversity management plan • Soil and water management plan (SWMP) • Cultural heritage management plan (CHMP) • Historic and natural heritage management plan • Flood management plan (FMP) • Contaminated land management plan (CLMP) and associated NOA management plan (if required) • Prepare-Act-Survive bushfire response plan • Construction waste management plan (CWMP) • Worker accommodation strategy.		Compliant	Confirmed during the Initial Construction Audit, the CEMP includes relevant sub-plans, activity-specific procedures and strategies, and site-based control maps as relevant for the development.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Biodiversity					
B1	Detailed design of the project will focus on the retention of managed shrub and groundcover vegetation zones, within the ECZ, HCZ and HTZ to avoid and minimise the loss of vegetation and habitat and movements of fauna across the landscape and to minimise the impact of predation on displaced fauna. Final design for permanent creek crossing structures on access roads will implement a design option to ensure stream flow is unaffected (e.g. single span to minimise stream disturbance and flow). Design and micro-siting of access tracks will avoid and minimise impacts to rock outcrops, large boulders, piled rock, and rock features that provide potential sheltering and breeding habitat for fauna including threatened species and avoid mapped habitat trees. Access track corridors will be established with consideration to terrain (e.g., utilisation of the ridgelines to navigate to the higher elevations) to minimise cut/fill and vegetation clearing.	Visual observation during site audit, Bridge design requirements confirmed during Audit 2.	Compliant	It is considered that the detailed design requirements have been met in relation to the clearing zones, permanent creek crossing structures and micro siting of access tracks.	
B2	A BMP will be prepared and approved prior to construction. The BMP will be prepared by a qualified ecologist in consultation with BCS and NPWS, and include a plan for implementing, evaluating and reporting on the effectiveness of all mitigation measures outlined in the revised BDAR (Appendix C), but not be limited to these measures. The BMP will be based on SMART principals (Specific, Measurable, Achievable, Realistic, Timebound) and will focus on monitoring the performance of proposed measures and informing an adaptive management approach based on performance triggers for remedial action or additional offsets where further impacts are identified. The BMP will include a program to monitor, evaluate and publicly report on the outcomes of a biodiversity monitoring program (refer Section 11.2 of the revised BDAR). The BMP must stipulate objectives for monitoring, and how baseline data will be captured and represented.	Biodiversity Management Plan (rev 0.13) dated 30/10/2024	Compliant	Confirmed during the Initial Construction Audit a Biodiversity Management Plan (BMP) has been prepared prior to the commencement of construction. The BMP was updated to Revision 13 during the audit period. Implementation of the BMP is assessed in BMP Management Measures Compliance Table (refer **Table 2** in **Appendix 4**).	
B3	A Rehabilitation Plan will be prepared and approved prior to construction in consultation with BCS, NPWS and FCNSW. The Rehabilitation Plan will inform the implementation of rehabilitation within the lease/licence area. Such areas will be identified in the final detailed design and will also include areas disturbed during construction that are not required to be maintained or cleared for the operation of the project. • The plan will focus on the implementation of soil erosion prevention, re-establishment of local endemic plant species suitable to the vegetation formation and habitat and outline the details of rehabilitation objectives and how their outcomes for success will be measured, locations, target landforms and plant community types • Restoration of riparian vegetation (i.e. weed control) will be implemented to protect and improve key habitat areas of the Booroolong Frog • The plan will include a program for adaptive monitoring of specific success measures and reporting and include a Trigger Action Response Plan (TARP). The TARP will include notification to NPWS and BCS that remedial actions have been triggered and agreement about the response • Revegetation of slopes will be undertaken in accordance with the rehabilitation plan • Landscaping of pervious surfaces using native indigenous species only • Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder) • Ongoing maintenance of the rehabilitation work will be required, including management of weeds and pathogens • Topsoil and subsoil generated during construction will be stockpiled separately on-site to be used for rehabilitation. Stockpiles will be managed according to best management practices (Managing Urban Stormwater: Soils and Construction).	DPHI Extension Request Approval Letter dated 06/11/2024 DPHI Portal Post Approval Form – RMP dated 03/02/2025	Compliant	An extension was sought during this audit period to extend the submission date of the Rehabilitation Plan. The Planning Secretary approved this extension request on the 06 November 2024 extending the submission date to the 04 April 2025. The Rehabilitation Plan was submitted to the Planning Secretary for approval on the 03 February 2025 and at the time of the audit it was pending approval (J. Snape pers comm).	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
B4	Pre-clearing Process: the pre-clearing process will include two stages. Stage 1 will include survey and translocation of any fauna from the disturbance area into areas of retained vegetation prior to the development of the project. This may include detailed markup of threatened species locations and their translocation such as *Caladenia montana*. All work must be carried out by qualified ecologist. The next pre-clearing stage will include final inspections of the disturbance area immediately before the construction activity commences to check and physically mark any important habitat features that need to be considered when identifying exclusion zones and conducting the staged habitat removal process within the total and partial clearing zones. Document, mark and record the location of: • Large stick nests • Any rock features • Habitat/hollow-bearing trees • Threatened flora. The outcomes of the pre-clearing inspections will be reported to BCS/NPWS prior to the commencement of vegetation clearing. The report will include any fauna relocated or euthanised, including name of qualified/licensed handler, species, location notes, and release location and method.	Maragle East Tower 7-9 and Maragle East E1-E17 Towers 10 & 11. CHPR, NPWS Pre-clearance Report Correspondence dated 03/02/2025 CHPR, NPWS Pre-clearance Report Correspondence dated 29/11/2024 CHPR, NPWS Pre-clearance Report Correspondence dated 01/10/2024 24hr Preclearing Checklist – E19, East ‣ West of Sheep Station Creek ‣ Access Track 5 from T9 to T10 dated 12/03/2025 24hr Preclearing Checklist – E05, East ‣ West of Sheep Station Creek ‣ T11 dated 11/03/2025	Compliant	Consistent with previous Construction Audits, NPWS and CHPR continue to receive pre-clearing reports (sighted). Preclearing reports were sighted and contained detailed information regarding the effort and observations related to pre-clearing surveys. During the audit, pre-clearing checklist forms were reviewed, along with a sample of records. **A review of these identified a number of inconsistencies**. Some were incomplete, lacking either an ecologist's or UGL's sign-off. **Opportunity for Improvement: It is recommended that reporting procedures for pre-clearance checklists be reviewed and improved to ensure consistency across reporting structures and improve clarity, accuracy, and compliance.**	
B5	• The boundary of the clearing limits for each disturbance zone will be clearly marked on site by a surveyor before vegetation clearing commences. • Exclusion zones, or 'No-Go' zones, will be clearly marked at the edge of the total clearing zones and ECZ to protect the vegetation to be retained outside the project from inadvertent direct impacts • Exclusion zones and the edge of the clearing boundary will be marked with high visibility fencing and signage • Booroolong Frog: A 50 metre exclusion zones will be marked and clearly delineated from other survey markers with signage place around the tributaries that flow downhill into the Yarrangobilly Creek, this includes the limits of clearing on the lower end of Sheep Station Creek, Cave Gully, Lick Hole Gully and Wallace Creek that are crossed by the project to protect the downstream habitat of Booroolong Frog • Booroolong Frog: The 50 metre exclusion zone adopted for the Main Works project on Yarrangobilly Creek, will be retained for construction of the transmission line • Hazard trees identified from the LiDAR assessment are to be flagged for removal, and any other adjacent and important habitat trees and features, also identified for retention and to avoid disturbance during the felling activity should also be clearly marked and included in maps within the CEMP.		**Non-compliant**	As identified in assessment against BMP Biodiversity Mitigation Measure BMP11 (refer **Table 2** in **Appendix 4**), **clearing activity along Track 5C was observed to extend close to or potentially beyond the approved disturbance boundaries**. UGL engaged a surveyor to verify the boundaries along Track 5C on the 13 March 2025. The surveyor verified clearing was within the disturbance boundary and that in this instance a conservative limit had been marked by the ropes inside the actual disturbance boundary. Despite this, the methodology used was inconsistent with BMP 11, which requires all boundaries of clearing to be delineated using high visibility fencing and clear signage. Even if ropes were reportedly in short supply, exclusion zone **boundaries were still crossed during clearing activities, undermining the intent of using flagging and delineation to protect sensitive areas**. Additionally, **blue ropes which are not the approved colour for marking exclusion zones were incorrectly used**, creating further potential for confusion and non-compliance. The 24hr pre-clearing checklists provided for Project East site also identified that there were some issues with ropes missing in this general area (T9 to T11). **Recommendation: It is recommended that, in future clearing activities, any deviations such as incorrect rope colours or inadequate boundary marking should be documented and addressed promptly. All delineation measures should be recorded in a central register to support traceability and compliance monitoring.**	**NC-12**
B6	A vegetation clearing methodology has been developed (provided as Appendix K of the revised BDAR), the methods described focus on the removal of vegetation in total and partial clearing zones. These methods will be incorporated as a vegetation clearing plan within the BMP designed to document the methods of vegetation and habitat clearing within each zone, including soil protection measures, mechanical and non-mechanical approaches, removal of habitat, protection of retained vegetation, and appropriate storage and re-use of mulch and timber to avoid disturbance of retained vegetation. Hollows logs and limbs encountered during clearing will be retained for placement within adjacent vegetation or on the maintained easement within shrub retention areas. The plan will include a requirement to prepare a post clearing report that records the final clearing extent using GPS to demonstrate whether clearing is within the approved disturbance area, and if exceeded, recalculate additional offset obligations.		Compliant	Confirmed during previous Construction Audits the requirements of Condition B6 are addressed in the BMP Appendix B Clearing Procedure. Implementation of the clearing procedure was reviewed against the BMP Biodiversity Mitigation measures during the audit and the findings are presented in refer **Table 2** in **Appendix 4**.	
B7	The vegetation clearing procedures will include provisions that any felled timber within Bargo State Forest that FCNSW determine can be repurposed will be removed off-site by FCNSW.		Compliant	Requirements of Condition B7 are addressed in the BMP Appendix B Clearing Procedure.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
B8	A staged habitat removal process will be required for removal of habitat (hollow-bearing trees, habitat trees, and bushrock) Staged habitat removal minimises direct impacts on fauna by providing them with an opportunity to vacate hollows and relocate naturally. The process includes: • If possible, avoid clearing during times when hollow-dependent fauna are breeding • Contact vets and wildlife carers before works commence • Ensure that licensed wildlife carers and/or ecologists are on site during habitat removal • Adopt two staged removal clearing non-habitat first (e.g. shrubs, regrowth, ground cover and nonhabitat trees). Allow at least 24 hours for fauna to vacate habitat before removing habitat • Ensure wildlife carers and/or ecologists are present during removal of habitat trees, and that habitat trees are felled carefully, using equipment that allows habitat trees to be lowered to the ground with minimal impact • A procedure for the ethical handling of injured or displaced fauna is to be documented in the BMP • Record the effort and outcomes of the habitat removal process • Save and reuse cleared material for rehab and habitat • Preparation of an 'Unexpected threatened species finds procedure' to be implemented during construction and operation. Applies to all activities that have potential to impact upon threatened flora and fauna species which have not already been assessed and approved. Any threatened entities found in a location previously unknown during construction or operation must be immediately notified to NPWS • Preparation of a Fauna handling and rescue procedure to be implemented during construction and operation.		Compliant	Requirements of Condition B8 are addressed in the BMP Appendix B Clearing Procedure, Appendix C Fauna Rescue and Release Procedure and Appendix D Unexpected Threatened Species Procedure. Implementation of staged clearing requirements is assessed under BMP Biodiversity Mitigation Measure BMP16 (Refer to **Table 2** in **Appendix 4**).	
B9	Clearance of construction areas prior to commencement of daily construction to ensure there is no wildlife present. This will involve drive through sweep of areas planned for construction, by the contractors environmental representatives. If an animal is located within the construction area during works, the Delivery Manager and Project Management Site Representative are to be notified immediately. All work must immediately cease within the immediate area of the find and a local wildlife rescue or an ecologist will be required for assistance where necessary.	Daily Site Diary samples	Compliant	Assessed as compliant against BMP Biodiversity Mitigation Measure BMP 37 (Refer to refer **Table 2** in **Appendix 4**).	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
B10	An operational Vegetation Management Plan (VMP) will be prepared by an experienced ecologist prior to commencement of project operation. The plan will focus on vegetation management within the ECZ and HTZ with the aim of maintaining long-term Vegetation Integrity targets. The VMP will interpret the vegetation integrity scores into feasible actions to maintain vegetation condition, and outline project specific ongoing vegetation clearing requirements and methodology. The VMP will include a strategy for maintaining the expected vegetation outcomes for all partial impact zones assessed in the revised BDAR. The strategy will: • Translate the vegetation integrity (VI) scores into management actions to be applied during construction and operation of the project • Include triggers for corrective actions • Include details for review and reporting by a qualified ecologist in consultation with NPWS and BCS • The VMP will be guided by Transgrid's vegetation risk model and operational vegetation clearance requirements, in addition to the principles for Integrated Vegetation Management (IVM) which will aim to preserve future Vegetation Integrity scores within the ECZ • Long-term monitoring will be conducted to measure the effectiveness of the VMP. The methods and timing of the monitoring will be documented in the VMP and will include a responsibility to report the results to BCS and NPWS • The VMP will detail methods for vegetation maintenance in the ECZ with a focus on retaining plant species diversity and cover of low understorey and groundcover plants <200mm, while tree and shrub regrowth will be suppressed for long-term easement management • The VMP will detail methods of maintenance in the HTZ with a focus on retaining all non-hazard trees, as well as shrubs, grasses, and forbs. Ongoing inspection (using Lidar, and follow-up on foot or drone) of hazard trees will occur and document the method of removal for each tree to ensure that non-hazard trees are not impacted during tree felling. Where threatened orchids are mapped (Caladenia montana), hazard trees will be sensitively removed to avoid impacting on the ground layer. This will include removing trees from the top down and cutting into small sections, transferring into the ECZ and mulching • The VMP will address measures required to minimise fire risk during operation of the project.	CHPR OVMP Extension Email Correspondence dated 31/10/25 NPWS OVMP Extension Email Correspondence dated 30/10/2025	Compliant	During the audit period an extension request was sought to extend the submission timeframe for the submission of the Operational Vegetation Management Plan. This request was subject to consultation with CHPR and NPWS, both of whom approved the extension. As a result, the submission deadline was extended by four months, with the new due date set for April 4, 2024. This change was reflected in the revised BMP, which was subsequently approved by the Planning Secretary.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
B11	A Soil and Water Management Plan (SWMP) will be prepared and implemented as part of the CEMP. The plan will include stringent controls to mitigate impacts of runoff and sediment transfer from the project area during construction and operation. Control measures will remain in situ until site stabilisation completion criteria are met. The plan will ensure protection of aquatic habitat in the tributaries crossed by the project, and particularly aimed at protecting the habitat for the Booroolong Frog associated with Yarrangobilly Creek. An assessment of the current sediment basin design for the Main Works project will occur, to determine if the design specifications are suitable for the additional sediment load expected during construction of the easement. Where modification or augmentation is required, sediment basins will be increased in size to cope with any additional expected sediment load. Sedimentation will be managed through implementation of effective sediment control management plans will be implemented to ensure that sediment does not enter the waterways and result in changes to the habitat structure of riparian areas or areas downstream of the project area. Effective control measures will include: • Erosion and sediment control plans for all stages of construction • The implementation of sediment control measures across the project area - sediment control ponds and sediment basins, coir logs and sediment fencing to control sediment run-off, catch drains and perimeter bunds and diversion drains • A schedule will be included for cleaning sediment basins with intervals to be informed from the outcomes of monitoring basins from Snowy 2 Main Works construction and catchment modelling. The schedule will include additional checks after rainfall events of >50 mm in 24 hours • Additional or supplementary control measures (i.e. sediment fencing, diversions, and detention ponds) will be implemented at high risk areas such as the bridge crossings at Sheep Station Creek, Cave Gully and Wallaces Creek and at structures sites and access roads on the slopes around Yarrangobilly Creek and associated tributaries • Additional water quality monitoring points will be installed and monitored in locations to be agreed with NPWS and BCS, which are downhill of the construction footprint and upstream of Booroolong Frog habitat. An adaptive monitoring plan will be developed to trigger a rapid response if sediment loads detrimental to Booroolong frog are detected • Runoff from spoil piles will be managed through the above listed control measures to ensure that there is no contamination or sediment entering waterways or adjacent areas • Accidental spills will be reported to the contractors environmental representative as soon as the incident is observed so that the site can be remediated rapidly • Implementation of tannin leachate management controls may be required as determined by the monitoring program • Sediment traps or filters (targeting removal of coarse sediment) will be maintained at all discharge locations and will be monitored and maintained as per the scheduled requirements • Other source controls, such as mulching, matting and sediment fences may be used in consultation with BCS and NPWS and need to be approved in the CEMP and any deviation from measures by DPE will need to be sought. Similarly, natural erosion controls incorporating organic materials, micro water capture and contour shaping will need to be approved in the CEMP where appropriate • Disturbed areas will be stabilised and rehabilitated to reduce erosion potential (i.e. exposure period of bare earth). This will be particularly important for revegetation of slopes as soon as possible, in accordance with the rehabilitation plan. Landscaping of pervious surfaces using native indigenous species only. Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder) • Any imported fill will be certified at source locations to ensure it is pathogen and weed free Excavated Natural Material or Virgin Excavated Natural Material) • An induction protocol will be mandatory for all personnel involved in construction and operation works • There needs to be acknowledgement of imported material e.g. road base being washed off tracks etc in the surrounding environment and how that will be dealt with.		**Non-compliant**	As identified in assessment against BMP Biodiversity Mitigation Measures (refer Table 2 in Appendix 4) during the audit period, four rainfall events occurred that resulted in potential impacts to Booroolong Frog habitat due to sediment-laden water discharges. These events are summarised below (further details refer to Condition B11): • 18 October 2024 – Turbid water discharge from Track 8 • 28–30 November 2024 – Turbid water discharges from Track 5 and Track 8 • 5 December 2024 – Turbid water discharges from Track 5 and Track 8 • 11 January 2025 – Turbid water discharge from Track 8 Each event involved significant rainfall that overwhelmed erosion and sediment control measures, resulting in the discharge of turbid water into areas known to support Booroolong Frog habitat. In accordance with the Trigger Action Response Plan, Stochastic monitoring was undertaken following the October 2024, November 20224, December 2024 and January 2025. As outlined in Section 4.4 of the Booroolong Frog Monitoring Program, NPWS was notified within the required two-hour timeframe following each incident with the exception of the 11 January incident. Transgrid became aware of the incident at 5:00pm, NPWS were notified at 8:20pm. During the site audit inspection, areas identified as Booroolong Frog habitat were inspected. In some locations, appropriate signage and rope barriers were in place to restrict access and protect sensitive areas. However, near Track 8—particularly in the vicinity of Wallaces Creek, where previous Booroolong Frog sightings have been recorded (J. Snape pers. comm), **erosion and sediment control measures were also inspected and found to be ineffective**. Specifically, **sediment fences installed along the creek edge were not properly embedded into the ground**, significantly reducing their effectiveness. This **improper installation creates a risk of sediment entering the creek during rainfall events**, potentially impacting the water quality and the frog's habitat. During the audit it was unclear if the area was part of development area or under a joint management area. **Opportunity for Improvement: It is recommended that, in future instances where rainfall events may potentially impact Booroolong Frog habitat, Transgrid ensure NPWS is notified within two hours of identifying the risk. All such notifications should be recorded in a central register to ensure accountability and traceability.** **Recommendation: It is recommended erosion and sediment controls near Track 8 and Wallaces Creek should be properly installed and maintained to prevent runoff into the creek.** **Opportunity for Improvement: It is recommended that erosion and sediment controls near the Booroolong Frog habitat be included in both pre- and post-rainfall inspections for the development. This will help ensure the controls are functioning effectively and provide ongoing protection for the nearby Booroolong Frog habitat.**	**NC-13**

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
B12	To prevent an increase in weeds and disease pathogens in adjacent vegetation the flowing will be carried out: Weed control and monitoring programs will be developed and documented in the BMP in consultation with BCS and NPWS and any deviation from measures approved by DPE are to be raised and approved. The program will include adaptive management strategies for priority weed species during construction, and early operational phase. The details of the monitoring program will be determined during the preparation of the BMP and follow the principles outlined in Section 11.2 of the revised BDAR (Appendix C) • Identify all weed species in KNP in consultation with NPWS. Priority weeds species in Bago State Forest are consistent with high threat weeds • Identify, map, and remove all weeds before clearing for construction, and record location of weed and sprayed area for use in ongoing weed monitoring and management programs. • Prepare a vehicle and machinery hygiene strategy and implement during construction and operation. The strategy will include specific locations, timing and methods for removing soil and plant matter from vehicles and machinery. Ensure vehicle and machinery hygiene measures in the strategy are applied during construction and operation • During the clearing works, weeds will be disposed and managed appropriately to stop the spread of weed species • Wash down stations will be constructed at suitable locations to wash down vehicles and employee shoes to stop the spread of weeds, pathogens (including amphibian chytrid fungus, *Phytophthora cinnamomi* and exotic rust fungi) and the introduction of new species • During construction, any biosecurity issues identified are to be reported to FCNSW and NPWS immediately.		Compliant	Requirements of B12 are addressed in the Biodiversity Management Plan Appendix H Weed and Pathogen Control Monitoring Program	
B13	To prevent an increase in predatory and pest species the flowing will be carried out: • Personal waste / refuse generated during construction will be stored appropriately in inaccessible bins and disposed at appropriate waste disposal facilities off-site. Any personal waste generated during operation will be removed from the site (including substation) and disposed in an appropriate waste facility. • A feral animal monitoring program will be developed and implemented as described in Section 11.2 of the revised BDAR (Appendix C) • Based on performance triggers for adaptive management. It will be important to share data with NPWs and State Forests. Increased predator activity will trigger the need for predator control based on performance measures to be outlined in the BMP. Control will be done in consultation with NPWS and DPE - State Forests.	SLR Quarter 4 Pest Monitoring Report dated 26/02/2025	Compliant	Inaccessible bins were observed onsite during the site audit inspection. Waste originating from the Eastern Project alignment is exported to Bellettes Landfill (EPA Licenced Facility) and waste from the Project West Is exported to Forest Hill Liquid Waste Storage and Transfer Station which is operated by JJ Richards and Sons. A Pest and monitoring Program has been prepared for the Project and is included as Appendix I in the BMP. Monitoring of feral pests has continued during the audit period.	
B14	The extensive survey data for this project, and the Main Works EIS will be utilised to identify specific bird and bat populations that are at risk of collision and electrocution. E.g. For higher risk species deploy species specific bird divertors, with day/night reflectors within approved buffer distance, along key sections of transmission line. This will be appropriate for diurnal and nocturnal birds The BMP to include adaptive management for high-risk bird and bat species as outlined below with intervals and strategies to be determined in consultation with NPWS: • Regular monitoring within the transmission line easements for evidence of bird / bat collision with transmission lines (intervals to be determined in consultation with NPWS) • Monitoring of taller structures for evidence of raptor nest building • Develop target trigger for number of high-risk species incidents • Deploy species specific bird / bat divertors / reflectors in areas where a defined number of incidents have occurred.		Compliant	Requirements of Condition B14 are addressed in the BMP Section 5.13 and Appendix K Bird and Bat Management Plan.	
B15	To reduce light impacts the following will be implemented: • Directional lighting will be used for any permanent lighting required (i.e. substation) to minimise light spill • Artificial lighting required during construction in the early morning and late afternoon in winter will be limited to within approved construction hours.		Compliant	No permanent lighting has been installed during the audit period. Works and lighting has been limited to approved construction hours (B. Toohey pers. comm).	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
B16	The barbed wire/razor wire fencing installed around the substation switchyard will have improved visibility measures installed, such as adding visible objects to the fence, for example tape, plastic flags, and metal tags.		Compliant	No barbed or razor wire has been installed around the substation switchyard during the audit period (B. Toohey pers. comm).	
B17	The ECZ will be maintained as per the VMP, with the preservation of low ground cover vegetation to provide cover for small ground-dwelling fauna and birds to cross the easement		**Non-compliant**	**Clearing of the ECZ assessed as non-compliant under BMP Biodiversity Management Measure BMP14, refer to Table 2 in Appendix 4. for further details of non-compliance and associated recommendations for remedial actions.**	**NC-14**
B18	Vehicle movements on newly formed access tracks will be limited to 20km/h speed limit implemented to reduce the risk of vehicle strike to fauna.		Compliant	Vehicle limits were sighted during the site audit inspection.	
B19	All tree pruning operations will be carried out in accordance with the Australian Standard AS4373-2007 Pruning of Amenity Trees.	Clearing and Grubbing Environmental Safety work Method Statement (rev 7) dated 17/02/2025	Compliant	Zero non-compliance's were reported in relation to tree pruning operations during the audit period. Tree pruning operations are carried out following relevant Environmental Safety work Method Statements (J. Snape pers. comm.).	
Aboriginal Heritage					
AH1	Where possible, impacts to identified Aboriginal sites will be avoided.		Noted		
AH2	A CHMP and accompanying unexpected finds procedure will be prepared, to guard against inadvertent impacts to Aboriginal objects during construction. The CHMP will specify that project works will be restricted to the disturbance area. It will include provisions to ensure workers are made aware of cultural heritage places and their value, for example through project inductions. The CHMP will include provisions to guard against indirect impact to AHIMS# 56-6-0477 and provide a method to manage potential heritage constraints and unexpected finds during construction. The long-term storage of any recovered Aboriginal objects will be developed during the completion of the CHMP, in consultation with the RAPs, but is likely to include (in preferential order): • Re-burial on site, in an appropriate location in the vicinity of the project • Lodged with a RAP under a Care and Control Agreement • Deposition with the Australian Museum.	Aboriginal Heritage Management Plan (rev 0.07) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit, an Aboriginal Heritage Management Plan (AHMP) has been prepared and forms part of the Heritage Management Plan for the development. The Heritage Management Plan inclusive of the AHMP was revised during this audit period. The revised Heritage Management Plan was approved by the Planning Secretary on the 07 February 2025. The AHMP addresses all requirements outlined in Condition AH2.	
AH3	Salvage collection of surface artefacts, will be carried out prior to construction, at ST PAD 01 and ST PAD 02, ST PAD 03, Str5 AS, AHIMS# 56-6-0540, and AHIMS# 56-6-0048 and AHIMS# 56-6—0477 (if required) with the RAPs. Surface collection will be undertaken using the following method: • Artefact collection will be undertaken by a team comprising an archaeologist and RAP representatives • Artefact locations will be marked on the ground and recorded with a hand-held GPS (or equivalent) prior to collection • Collected artefacts will be catalogued on site by the team, with recorded attributes as listed for the test excavation analysis • Artefacts will be placed in individual bags, labelled with location information • Following the completion of the surface collection program, a brief report will be prepared which outlines the results of the program.		Compliant	Confirmed during the Initial Construction Audit a program of surface collection was completed for associated Aboriginal sites and reported.	
AH4	In the event that a site or artefact (as defined by the NPW Act or Heritage Act) is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to TransGrid, and the regulator in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator. In the event that skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and TransGrid, NSW Police and Heritage NSW contacted.	Maragle Transmission Line Project Heritage Clearance Letter – Maragle East Track 5A to 5C dated Novembre 2024	Compliant	Three Unexpected Aboriginal heritage finds were identified by Aboriginal representatives from the Tumut Brungle Local Aboriginal Land Council during clearance works on November 6–7, 2024. These finds were located outside the disturbance boundary on Maragle East Track 5A to 5C, within Parcels E20 to E34. All Aboriginal Heritage Impact Management site cards for these locations have been submitted and approved for sites TCP T7 01 to TCP T7 03.	
AH5	If changes are made to the project to include impacts outside the disturbance area, further archaeological investigation will must be conducted		Not triggered	No changes to the Project to include impacts outside the disturbance area were determined during the audit period (J. Snape pers. comm). Confirm?	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Non-Aboriginal Heritage					
NH1	During detailed design, if the disturbance area changes but is still within the project area, a consistency assessment will be prepared to confirm if impacts are consistent with the EIS.		Compliant	No significant changes to the Project design have occurred from what was assessed in the EIS (J. Snape pers. comm).	
NH2	A historic and natural heritage management plan will be prepared for the project, which clearly outlines the extent of impact to each recorded historic heritage item within the disturbance area and potential impacts to those sites located within the broader project area. The plan should clearly outline measures for their protection (where applicable) and details of further investigation and archaeological archival recording where appropriate.	Historic Heritage Management Plan (rev 0.09) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit, a Historic Heritage Management Plan has been prepared and forms part of the Heritage Management Plan for the Project. The Historic Heritage Management Plan addresses all requirements outlined in Condition NH2.	
NH3	If archaeological excavations are required: • Transgrid will nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program. This person must fulfil the Heritage Council's Excavation Director Criteria 2019 for the excavation of locally significant archaeological sites • Archaeological Research Design and Excavation Methodology will be prepared to guide the archaeological program. It will be prepared according to Heritage Council of NSW guidelines. The methodology will be submitted for comments to the Heritage Council of NSW (or its delegate) and approval by DPE prior to the commencement of archaeological excavation • A final archaeological excavation report will be prepared within 12 months of the completion of archaeological excavation. It will include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the land owner. Copies of the final excavation report will be provided to DPE, the Heritage Council of NSW and to the local Council's local studies unit.		Not triggered	No historical (non-Aboriginal) heritage archaeological excavation activities were required during this audit period (J. Snape pers. comm).	
NH4	All heritage items within the disturbance area that are to be impacted by the project will be subject to archival recording and archaeological excavations prior to the commencement of works. If these sites have been entirely destroyed by the Snowy 2.0, then the mitigation measures relating to archival recording and archaeological excavations will not apply.		Compliant	Confirmed during the Initial Construction Audit, further assessments were undertaken to determine heritage management actions. Archival recordings were only required to be undertaken R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.	
NH5	If the construction of the project will destroy or directly impact the R45 (Lobs Hole Copper Mine Water Race), archival recording and archaeological excavation must occur prior to the commencement of construction.		Compliant	Confirmed as part of the Initial Construction Audit, archival recordings were only required to be undertaken R56 and R120. Archival records are included in Appendix 3 of the Post Approvals Historic Management Actions Report.	
NH6	In the event that a site or artefact (as defined by the NPW Act or Heritage Act) is identified during construction works, works will cease at the location and no further harm to the object will occur. The find will be immediately reported to TransGrid, and the regulator in accordance with legislation. No work will commence in the vicinity of the find until any required approvals have been given by the regulator. In the event that skeletal remains are encountered during the activity, works must stop immediately, the area secured to prevent unauthorised access and TransGrid, NSW Police and DPIE contacted.	Maragle Transmission Line Project Historic Unexpected Find Short Report and Significance Assessment dated December 2024	Compliant	An Unexpected Historical Object (Drain Refuse) was identified on 6 November 2024 during machine partial clearing areas carried out in the Track 7 clearance location. Following site inspection, it was determined that Track 7 Historic Drain Refuse contains no archaeological significance, and very limited research potential. It is not a relic as defined under the *NSW Heritage Act 1977* (as amended 2009) and does not meet requirements for listing on the Heritage NSW Heritage Management System.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Water					
W1	The waterway crossing over flood impacted waterways such as Sheep Station Creek will be designed and constructed in a way that minimises flood risk and minimises upstream and downstream impacts. The waterway crossing will be designed to ensure flow and drainage is maintained in waterways where construction works are taking place or where the permeant waterway crossing will be. The waterway crossing will be constructed in accordance with minimum design criteria for waterway crossings outlined in Why do fish need to cross the road? Fish passage requirements for waterway crossings (Fairfull and Witheridge, 2003). The design of waterway crossing will also consider the appropriate measures are outlined in: • Forest Soil and Water Protection – A Guide for Operators (State Forests of NSW, 2000) • Fire Trail Design, Construction and Maintenance Manual (RFS, 2017). All new waterway crossings, construction and rehabilitation of works near or within watercourses be accordance with the requirements of the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).		Compliant	Confirmed during Construction Audit 2, the temporary and permanent design of Sheep Station Creek Bridge complies with all guidelines outlined by Condition B31 of the Infrastructure Approval. Since the bridge clear spans the creek channel, there will also not be any alteration of velocity or flow distribution. During the site audit inspection it was noted that appropriate erosion and sediment controls were installed surrounding the temporary Sheep Station Creek Bridge. However, some **sediment was observed accumulating on the temporary bridge deck and was likely being washed over the sides during rain events.** This was evident through the presence of sediment on beams underneath the bridge. **Recommendation: It is recommended to prevent ingress of sediment into Sheep Station Creek from the temporary bridge deck, sand bags or similar (where safety permits) are installed along the outermost edges of the temporary bridge deck to prevent sediment being washed into the creek.**	
W2	• Flood modelling will be undertaken at the detailed design stage to define flood behaviour for the existing conditions due to mainstream and overland flooding. The flood models will be utilised to identify and address potential impacts of the proposed works for construction and operation of the project on flooding • Overland flooding impacts will be considered during detailed design, to ensure that the substation's drainage and stormwater system is adequate, and the substation's platforms are above the required flood immunity • Structures within the flood extent will be designed with appropriate foundation to ensure stability against hydrostatic pressure and debris load.		Compliant	Consistent with Condition W1, flood modelling has been undertaken by SLR to enable identification of any potential impacts from and to Sheep Station Creek Bridge as a result of flooding. Flooding impacts will be considered during the detailed design of the substation however the design has not been finalised during the audit period (B. Toohey pers. comm)	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
W3	A SWMP will be prepared and implemented prior to and during construction. During the preparation of SWMP, Transgrid will working closely with the EPA in developing and designing key sediment and erosion controls as to prevent any change to the existing baseline surface water quality within and adjoining the project area. The SWMP will include: • Erosion and sediment control plans for all stages of construction that will be submitted for approval prior to its implementation. Initially the principal SWMP will be prepared, and it will be followed by the Progressive SWMP that will be regularly updated during the construction phase to take into consideration changes that may occur that require revised erosion and sediment controls • Details on the construction and management of sediment basin if determined to be required • Protection of waterways such as scour protection, stabilisation and revegetation • Any imported fill will be certified at source locations as pathogen and weed free Excavated Natural Material or Virgin Excavated Natural Material) • Management of stockpiles and spoil • Tannin leachate management controls • Management of accidental spills, response and reporting • An induction protocol • Responsibilities for all management measures. All erosion and sediment control measures will be designed, implemented, progressively rehabilitated and maintained in accordance with relevant sections of Managing Urban Stormwater: Soil and Construction Volume 1 (Landcom, 2004) ('the Blue Book') (particularly Section 2.2) and Managing Urban Stormwater: Soil and Construction Volume 2A – Installation of Services (DECC, 2008).	Soil And Water Management Plan (rev 0.10) dated 24/10/2024 Track 4 PESCP dated 27/11/2024 Track 5c PESCP dated 2/09/2024	**Non-compliant**	Confirmed as part of the Initial Construction Audit, the SWMP and primary ESCP addresses all requirements outlined by this condition. An ESCP (sighted) has been prepared for the Project and is incorporated within the SWMP. The ESCP documents the planned measures to minimise erosion and control sediment generation. Progressive ESCPs have also been prepared to accompany the Primary ESCP. The Progressive ESCPs are updated regularly based on changes to site conditions and can take the form of "red line" mark ups of drawings. Revisions are documented in a Progressive ESCP register (sighted). No fill has been imported to site during the audit period. During the site inspection the following observations were made with respect to erosion and sediment controls: - One sediment basin located at the base of Track 8 has been installed during the audit period, which makes two sediment basins currently in operation onsite. No discharges from either basin have occurred during the audit period (J. Snape pers. comm). - Appropriate erosion and sediment controls were installed surrounding the temporary Sheep Station Creek Bridge. The temporary bridge deck includes a lip along the edge of the bridge and geofabric slung underneath the bridge deck to catch sediment. However, some sediment was observed accumulating on the temporary bridge deck, within the lip and was likely being washed over the sides during rain events. This was evident through the presence of sediment on beams underneath the bridge and sediment on the geofabric slung underneath the bridge deck. - Stockpiles were managed appropriately with drainage controls installed upslope and sediment controls installed downslope. - Accidental spills have been reported and documented as per incident reports. Six incidents reports regarding turbid water were documented and reported during the audit period. - it was noted that the installed ESC controls on the western side (Maragle) of the development included well installed enhanced erosion controls, including (but not limited to) mulch, soil binder and rock lining covering the majority of exposed surfaces. The installed ESC controls on the western side of the development were observed to be well maintained. - Inspection of the works being undertaken on the Eastern side (Lobs Hole) of the development highlighted **some areas were in need of improvement regarding installed controls, particularly around Tracks 4 and 5**. It was noted that there were more extensive active work areas and steeper slopes on the Eastern side. Active works included installation of access tracks and tower pads. Review of the Progressive ESCPs for the Eastern Section indicate that proposed controls should primarily consist of stabilised or lined diversion bunds and/or mulch bunds on either side of the tracks being installed, with runoff diverted to regular sediment traps with rock filter dams to be placed at the discharge point. **.** - It was observed that some of the installed sediment traps had been sprayed with soil binder however the **outlets did not have rock filter dams placed at the discharge point as indicated in the Progressive ESCP**. The Progressive ESCP indicates that bunds will incorporate returns with regular "lined spillway weirs", however **very few of these were observed to be installed on some of the tracks in the Eastern Section**. **Some had been installed and sprayed with soil binder but not lined** (as indicated in the Progressive ESCP drawings). This condition states "*Transgrid will work closely with the EPA in developing and designing key sediment and erosion controls as to prevent any change to the existing baseline surface water quality within and adjoining the project area*.". Water Quality monitoring results have been published on the Project's website up to January 2025. Monitoring Reports were sighted for all months except February, which was in preparation at the time of the audit. A review of the available reports identified exceedances of various water quality parameters at multiple locations and timeframes across the project site. However, the reports to date have not identified any exceedances as being attributable to construction activities associated with the development.	**NC-15**

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
				The SWMP indicates that tannin leachate will be monitored for in the weekly inspections however **there are no triggers/sections included within the weekly inspection checklist regarding tannins.** **Recommendation: It is recommended to prevent ingress of sediment into Sheep Station Creek from the temporary bridge deck, sandbags or similar (where safety permits) are installed along the outermost edges of the temporary bridge deck to prevent sediment being washed into the creek or more frequent removal of sediment on the bridge deck is undertaken to reduce the build-up of sediment on the bridge deck.** **Recommendation: It is recommended that the installed ESCs and ESCP in the Eastern Section of the development, particularly from Track 4 to Track 5, are reviewed to ensure installed controls are compliant with the Progressive ESCP and that where practicable the Progressive ESCP incorporates enhanced erosion and sediment control. In particular, focus should be given to ensuring the outlets of sediment traps have rock filter dams placed at the discharge points as per the Progressive ESCP.** **Recommendation: Update the weekly inspection checklist to include a section/prompt regarding tannin leachate management.**	
W4	A water quality monitoring program will be developed as part of the SWMP as described in Appendix E. It will be developed and implemented to gain an appreciation of background water quality, to observe any changes in surface water quality that may be attributable to the project and inform appropriate management responses. The surface water quality monitoring program will be carried out during the pre-construction, construction, and operational stages of the project.	Soil And Water Management Plan (rev 0.10) dated 24/10/2024 Baseline Water Quality Report (rev Final V3.1) dated June 2025 (NGH)	Compliant	A Water Quality Monitoring program (WQMP) has been developed and is included as Appendix F of the SWMP. The WQMP documents the methodology for the implementation of a background water quality monitoring program including distribution of sampling locations, frequency and type of analytes to monitor and trigger values for determining potential environmental impact and the associated trigger action response plan (TARP). Baseline water quality monitoring was undertaken from 2022 to 2024 with reports being available on the projects website up to January 2025. A "Baseline Water Quality Report" has been prepared which presents the results from the 24 months of sampling undertaken prior to construction commencement and provides site specific guideline values for three reference sites for the project. Water quality monitoring has been undertaken during the audit period.	
W5	• All chemicals or other hazardous substances will be stored in a bunded area and away from any drainage lines/pits. The capacity of the bunded area will be at least 130% of the largest chemical volume contained within the bunded area • No refuelling or bulk herbicide preparation will occur within 40 m of natural drainage lines • Environmental spill kits containing spill response materials suitable for the works being undertaken will be kept on site at all times and be used in the event of a spill • Any spills will be contained, cleaned up promptly and immediately reported to the relevant site representative.	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit relevant mitigation measures are considered in the SWMP. It was observed during the site audit inspection chemicals were stored within bunded containers. Evidence of drip trays being implemented during refuelling were also observed.	
W6	• The SWMP will include arrangements for managing wet weather events, including monitoring of potential high risk events (such as storms) and specific controls and follow-up measures to be applied in the event of wet weather • Where required, adequate sediment controls (including the consideration of sediment basins) will be included in the access track design to manage erosion and sedimentation and associated impacts on receiving waters.		Compliant	Confirmed during the Initial Construction Audit relevant mitigation measures for wet weather events are considered in Section 5 of the SWMP and Section 5 of the ESCP. It was also confirmed ESCs for access tracks are documented within the Progressive ESCPs for the Project.	
W7	For the Snowy 2.0 T2 Tailbay site and Paddys River water uptake site: • A water extraction licence will be sought prior to the extraction of any water from Talbingo Reservoir and the Paddy's River • Prior to extraction of water near Paddy's River Flat Campground, rubber mats will be placed on the ground under the water trucks to prevent erosion and sediments entering the waterway • During water extraction from Talbingo Reservoir and Paddy's River, slow velocities of water pumping and screens on the hoses will be used to minimise small aquatic fauna been inadvertently picked up.		Compliant	Confirmed during the Initial Construction Audit the Project only holds two water access licences which include: • WAL44782 • WAL44788. In response to an issue encountered with WAL44782 in Construction Audit 2, the development is seeking to obtain a new WAL with a water allocation. An application was submitted (sighted) in January 2025 during this audit period. Approval was still pending at the time of the audit.	
W8	Temporary dewatering for construction is not anticipated. In the event that dewatering is required then the following management measures will apply:		Compliant		

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
	• Confirmation of whether or not a licence under the WM Act as defined under the NSW Aquifer Interference Policy (DPI Water, 2012) is required prior to any dewatering activity commencing • Should the amount of water extracted be more than 3 ML/year, a water access licence will be obtained • If dewatering is required, the management of discharge water will be documented in the SWMP Discharge water will be limited to vegetated, grassed areas, away from waterways, and within the construction footprint. If the discharge water is highly turbid, dewatering through a filter sock (or similar), or via transportable sedimentation tanks will be considered, where appropriate, to minimise sedimentation.	Soil And Water Management Plan (rev 0.10) dated 24/10/2024		Confirmed during the Initial Construction Audit, the management of discharge water is included in the SWMP alongside a Water Irrigation and Disposal Permit which is included as Appendix I. During this audit period no dewatering of groundwater has occurred (B. Toohey pers. comm).	
W9	A flood management plan (FMP) will be prepared for the project and will detail the processes for flood preparedness, materials management, weather monitoring, site management and flood incident management. The FMP will also address procedures and responsibilities for flood response (preparation of site upon receipt of flood warning, evacuation of site personnel) during and recovery following a flood event.		Compliant	Confirmed during the Initial Construction Audit Flood management has been addressed in the Emergency Plan for the Project and addresses all of the requirements outlined by this condition.	
W10	Waterway crossing and access tracks will be inspected as part of the maintenance inspections to ensure all crossings remain in good condition.	Soil And Water Management Plan (rev 0.10) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit monitoring requirements for soil and water management including waterway crossings and access tracks is included in Table 6-1 of the SWMP. During the audit period it was observed that waterway crossings have been considered within the pre-rainfall inspection checklists (sighted). In response to the recommendation outlined in construction Audit 2 it is evident pre-rainfall inspection include me**asures to inspect the conditions and controls installed around waterway crossings and access tracks** however **these actions are outstanding in the weekly and post- rainfall inspection checklists**. **Recommendation: It is recommended that the environmental inspection weekly checklist and post- rainfall inspection checklists are updated to include a compliance measure relating to the conditions and controls installed around waterway crossings and access tracks to prompt staff completing these inspections to check all tracks and crossings remain in good condition.**	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Land					
L1	Targeted geological investigations will be undertaken in areas of surface disturbance using a risk-based approach. Results from these investigations will determine the level of management to be implemented for soils and contamination (including NOA).	Asbestos in Soil Analysis Jone Environmental Consulting dated 30/10/2024	Compliant	During the audit period NOA testing was undertaken at Track 2, Tower 12 & Pad 13. No asbestos was identified in any samples from either the source area or stockpiled material.	
L2	A contaminated land management plan will be prepared prior to construction works commencing. It will include management measures to • Manage areas of known or potential contamination that will be impacted during construction • Manage unexpected finds in the event that unexpected contamination sources are identified (including NOA). This will include guidance on identifying potential contaminated land characteristics (visual, odours, etc), steps to cease works in the affected area, further investigation to assess the extent, magnitude and type of contaminants and appropriate remedial actions.		Compliant	Confirmed during the Initial Construction Audit, a Contaminated Land Management Plan has been included in the Soil and Water Management Plan and is listed as Appendix H. The Contaminated Lanad Management addresses the requirement outlined in Condition L2.	
L3	• Further assessment will be carried out during the geotechnical investigation for the project to verify the presence/absence of NOA within the NOA risk zones. Should NOA be detected, a NOA management plan will be prepared and implemented to guide the handling, transport and disposal of the material • NOA awareness training will be provided to all staff and contractors working in areas with NOA risk • If asbestiform and/or indicator minerals and/or textures are encountered or suspected during excavation works, work is to stop in the area and management be alerted. The area will be isolated with a 10 metre exclusion zone and sign posted, access will be restricted and specialist geological and occupational hygiene advice will be sought prior to further progressing work in that area.	Asbestos in Soil Analysis Jone Environmental Consulting dated 30/10/2024	Compliant	UGL have conducted sampling for NOA during the audit period. NOA sampling has been undertaken at Track 2, Tower 12 & Pad 13. No asbestos was identified in any samples from either the source area or stockpiled material.	
L4	A spoil management strategy will be prepared for the project. The spoil management plan will outline appropriate management procedures for the generation, management and importation (if required) of spoil. It will include, but not be limited to: • Confirming spoil quantities • Carrying out appropriate assessments, including geotechnical investigations • Procedures for classification of spoil • **I**dentification of spoil reuse measures, including segregation of soils as subsoils and topsoils • Spoil stockpile management procedures including minimising the number of stockpiles, area and time they are exposed, and locating stockpiles away from drainage likes and natural waterways and from where they will be susceptible to erosion • Spoil haulage routes • Spoil disposal and reuse locations • Imported spoil sources and volumes.		Compliant	Confirmed during the Initial Construction Audit, a Spoil Management Plan has prepared for the Project and addresses all of the requirements outlined in Condition L4.	
L5	Management of topsoil stockpiles and other excavated material stockpiles to minimise dust and sediment in runoff will include: • Minimising the number of stockpiles, area and time they are exposed • Locating stockpiles away from drainage lines and natural waterways and from where they will be susceptible to erosion • Stockpiles will be bunded in accordance with the Blue Book (Landcom, 2004) Managing Urban Stormwater – Soils and Construction, Volume 1, 4th Edition) Stabilise stockpiles, establish sediment controls and suppress dust as required.		Compliant	Confirmed during the Initial Construction Audit, Stockpile management requirements are included in Section 5.2 of the Primary Erosion and Sediment Control Plan. During the site audit inspection stockpiles were observed to be managed appropriately.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
L6	Excavated material will be managed in accordance with the spoil management strategy. • Where applicable, excess spoil will be re-used for other elements of the project such as access track construction. Where spoil cannot be reused it will be managed as per the SWMP. Alternatively, excess material will be disposed of at other suitable locations (including at Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas) as agreed to with NPWS, FCNSW. • Material which has been assessed as not suitable for reuse on land or for subaqueous disposal at the Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas (as part of the Snowy 2.0 management procedure) or cannot be reused will be classified in accordance with the Waste Classification Guidelines (EPA, 2014). Excavated material will be transported to an appropriate excavated material disposal area. Approval will be obtained prior to transport and will require an estimate of the likely volume of excavated material to be disposed		Compliant	Confirmed as part of the Initial Construction Audit, the Spoil Management Plan addresses all of the requirements outlined in this condition.	
L7	Excavated material to be disposed in the spoil emplacement locations (including Ravine Bay, GF01, Main Yard or other Snowy 2.0 approved emplacement areas will be transported to the emplacement area by TransGrid and/or contractor and then managed by Snowy Hydro in accordance with the relevant approved Snowy 2.0 Rehabilitation Plan prepared by Snowy Hydro.	Spoil Movement and Placement Permit SMP-016 dated 24/02/2025 Spoil Movement and Placement Permit SMP-009 dated 24/10/2024	Compliant	All spoil transported during this audit period has been utilised either to support the construction of temporary or permanent infrastructure for the development (Permit SMP-016 sighted) or has been transported to the Main Works Temporary Stockpile (Emplacement Area) (Permit SMP-009 sighted).	
L8	The CEMP will include measures to identify and report any newly identified geodiversity sites. It will also include measures to minimise impacts to known geodiversity sites		Compliant	Confirmed during the Initial Construction Audit measures considering geodiversity sites have been included in relevant sub-plans.	
L9	A Rehabilitation Plan will be prepared in consultation with NPWS and FCNSW to guide the long term rehabilitation of the project. The rehabilitation plan will be based on the rehabilitation strategy outlined in Section 5.4.10 and will: • Include a detailed plan for rehabilitation of the site • Characterise the soil types within the disturbance area • Include details of soil management measures, including • Topsoil stripping and stockpiling procedure • Subsoil management measures • Soil reinstatement methodology which includes a topsoil application procedure • Include measures to minimise: • Loss of soil • Loss of organic matter, nutrient and soil decline • Compaction • Consideration of how rehabilitation will be carried out where soils are unable be recovered, or soils are poor/unfit for re-use • Include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the sites, and triggering any remedial action (if necessary) • Describe the measures that would be implemented to: • Comply with the rehabilitation objectives and associated performance and completion criteria • Progressively rehabilitate the site • Include a program to monitor and report the effectiveness of these measures.	DPHI Extension Request Approval Letter dated 06/11/2024 DPHI Portal Post Approval Form - RMP dated 03/02/2025	Compliant	An extension was sought during this audit period to extend the submission date of the RMP. The Planning Secretary approved this extension request on the 06 November 2024 extending the submission date to the 04 April 2025. The RMP was submitted to the Planning Secretary for approval on the 03 February 2025. At the time of the audit the RMP was still pending approval (J. Snape pers comm).	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Transport					
T1	A CTMP will be prepared and implemented and will include • Confirmation of haulage routes • Measures to maintain access to local roads, and maintain the capacity of existing roads where possible • Site specific traffic control measures (including signage) to manage and regulate traffic movement • Requirements and methods to consult and inform the local community of impacts on the local road network due to the development-related activities • Consultation with TfNSW, and Snowy Valleys Council, NPWS, FCNSW and Snowy Hydro's contractors • The investigation of alternative routes to avoid transport through Batlow through the use of roads owned by FCNSW • Consultation with the emergency services to ensure that procedures are in place to maintain safe, priority access for emergency vehicles and emergency management activities • Access to construction sites including entry and exit locations and measures to prevent construction vehicles queuing on Elliott Way • A response plan for any construction related traffic incident • Monitoring, review and amendment mechanisms • Individual traffic management requirements at each phase of construction • Measures to minimise the number of workers using private vehicles travelling to and from project area west • Employment of standard traffic management measures to minimise short-term traffic impacts expected during construction • Management of oversized vehicles • Relevant traffic safety measures, including appropriate signage, driver conduct and safety protocols • **I**dentify requirements for, and placement of, traffic barriers. • A fatigue and weather condition management plan for both light and heavy vehicles that details driver protocols for both driver fatigue and adverse weather • Bridge load assessments will be carried out in conjunction with the OSOM permit application process. The CTMP will also consider the following strategies to maintain access for regular and emergency management activities: • Staging of construction works to avoid the need for roads to be fully closed for any extended period of time • Development of alternative access routes in consultation with NPWS and emergency services if any closures are required • Provision of sufficient shoulder width or regular stopping bays to allow regular and emergency vehicles to pass or stop.	Utilities Transmission Line Traffic And Transport Management Plan (rev 0.19) dated 13/08/2024	Compliant	Confirmed during the Initial Construction Audit, a Transport and Traffic Management Plan (TTMP) has prepared for the Project and addresses all of the requirements outlined in Condition T1. The TTMP has been revised during the audit period. Please see Condition B32 in the Infrastructure Approval Tables for further detail.	
T2	Should the construction planning require that heavy vehicles to use the route via Elliot Way, Link Road and Goat Ridge Road between the project area east and project area west, the details will be included in the CTMP and a road safety audit and risk assessment will be carried out.		Not triggered	Not triggered during the audit period (J. Snape pers. comm).	
T3	If works will affect the free flow of traffic a Traffic Control Plan will be prepared, and a Road Occupancy Licence will be obtained from TfNSW.		Compliant	Works during this audit period have not affected the free flow of traffic on state roads during this audit period (J. Snape pers. comm).	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
T4	Road maintenance will be managed through the following measures: • A road dilapidation survey of Elliott Way and other potential local roads utilised by the project will be carried out prior to commencing construction as agreed to with Snowy Valleys Council and NPWS. Any impacts identified as caused by the project will be rectified as specified with any road maintenance agreements • Routine defect identification and rectification of the access roads and tracks will be managed as part of the project maintenance procedure • Access roads and tracks will be designed in accordance with the relevant vehicle loading requirements.	Project: Maragle Project, Tumbarumba to Old Quarry entrance (Elliot Way), New South Wales Dilapidation Survey Report Streetscape dated June 2024	**Non-compliant**	In accordance with the Road Maintenance Agreement – Execution Version between Transgrid and SVC, the dilapidation report is required to be updated every 6 months. **No verifiable evidence could be provided to show any updates to the dilapidation report have been undertaken during the audit period.** See Condition B29 of the Infrastructure Approval Table for details. **Recommendation: It is recommended Transgrid updates the existing dilapidation report to assess the requirements outlined by Condition B29(a) as per the requirements of the Road Maintenance Agreement.**	**NC-16**
T5	Affected communities, visitors, FCNSW, NPWS and emergency services will be notified in advance of any disruptions to traffic and restriction of access impacted by project activities.		Compliant	Consistent with previous Construction Audits, Transgrid continue to operate in accordance with the Stakeholder and Community Engagement Plan.	
T6	Access protocols within KNP will be undertaken in accordance with the MOU between TransGrid and NPWS for the Procedure for the Undertaking of Inspection, Maintenance and Emergency Works of TransGrid Network Assets and Associated Infrastructure.		Noted		
T7	For the access track to structures 12 and 13 (first two structures on the western side of Talbingo Reservoir), measures will be incorporated into the final design under consultation with NPWS to enable vehicles to safely stop for personnel to open and close the access track gate. Such measures may include: • The placement of the gate at a suitable distance along the track as to avoid vehicles parking on/adjacent to Elliott Way • Incorporation of a pull over bay alongside the existing Elliott Way road surface. • Appropriate safety measures including the use of guard rails will be incorporated into the design where required.		Compliant	Access tracks to structures 12 and 13 are still subject to detailed design. UGL are currently undertaking consultation with NPWS regarding design (B. Toohey pers. comm). Guard rails have been installed on Track 2 and is anticipated another guard rail would be installed on Track but this is subject to further consultation with NPWS. There is also prospects of the installation of gates but this is yet to be confirmed (B. Toohey pers. comm).	
Landscape Character and Visual Impact					
VIA1	Detailed design will consider the retention of existing vegetation to the greatest extent practicable south of Elliott Way and around the substation to ensure that potential visual impacts from Elliott Way are minimised.		Compliant	Confirmed during the Initial Construction Audit, the Visual Impacts Management Plan ensures the detailed design considers the retention of existing vegetation. It is noted the revised Visual Impact Management Plan was approved by the Planning Secretary during the audit period. The revised Visual Impact Management Plan was approved on the 25 October 2024.	
VIA2	• All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and will be removed from the site following the completion of construction • Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality • On completion of the work disturbed areas will be stabilised and returned to as close to original condition.	Soil And Water Management Plan (rev 0.09) dated 24/11/2023	Compliant	Confirmed during the Initial Construction Audit some details outlined in this condition are included in the Soil And Water Management Plan however the Project would ensure requirements are covered within the Rehabilitation Management which is currently pending approval from the Planning Secretary (J. Snape pers. comm) Condition will be revised upon the approval of the Rehabilitation Management Plan.	
VIA3	• The new structures will undergo accelerated ageing of the zinc galvanised coatings prior to erection to help reduced the visual impacts of the project • To assist with reducing the visual obviousness of the structures through Lobs Hole Ravine, five structure pairs (Structure pairs 1, 2, 3, 7 and 8) will be painted olive green.	Visual Impact Management Plan (Rev 14) dated 27/07/2024	Compliant	Mitigation measures outlined I Condition VIA 3 are addressed in Section 5.2. of the Visual Impact Management Plan.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Noise and Vibration					
NV1	The standard techniques for controlling noise impacts during construction are presented in the ICNG. During construction relevant standard measures as outlined in Section 6 of the ICNG will be implemented.	Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit noise mitigation measures are included in Section 7 of the Noise and Vibration Management Plan (NVMP).	
NV2	Do not conduct vibration intensive works within the recommended safe setback distances. Avoid the use of vibration intensive plant within the nominated human comfort distances.	Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit relevant management measures considering vibration outlined by Condition NV2 are included in Section 7 (Table 7.1) of the NVMP.	
NV3	Care will be taken when carrying out vibration-intensive activities (e.g. use of hydraulic rock breakers and vibratory rollers, and blasting) within distances approaching the recommended safe setback distances around heritage items R45 and R49. Where maintaining of these setback distances is not possible a suitably qualified person will be present or monitoring will be undertaken during the works to suspend activities in the instance of any issues.	Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit relevant management measures considering vibration outlined by Condition NV3 are included in Section 4.2 of the NVMP.	
NV4	A detailed blast plan will be prepared by the blasting contractor prior to each blast to mitigate the potential for the recommended safe setback distances being encroached.	Noise and Vibration Management Plan (Rev 0.07) dated 24/10/2024	Not triggered	No blasts have occurred during this audit period (J. Snape pers. comm).	
Air Quality					
AQ1	Air quality mitigation measures will include, but not be limited to: • Identifying potential sources of air pollution • Dust mitigation and suppression measures to be implemented • Plant and equipment will be switched off when not in use • Vehicles, plant and construction equipment will be appropriately sized for the task and properly maintained so as to achieve optimum fuel efficiency • Materials will be delivered with full loads and will come from local suppliers, where possible • Methods to manage work during strong winds or other adverse weather conditions • A progressive rehabilitation of disturbed areas.	Soil And Water Management Plan (Rev 0.10) dated 24/10/2024	Compliant	Confirmed during the Initial Construction Audit air quality mitigation measures are addressed in Section 5.8 of the SWMP. During the site inspection, water carts were observed in operation to ensure dust was effectively mitigated. Equipment plant and construction equipment were also observed to be well maintained.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Hazards and Risks					
HAZ1	All designs will be in accordance with the ICNIRP Guidelines for limiting exposure to time varying Electric and Magnetic Fields (1Hz – 100Hz) (ARPANSA, 2010) with consideration to the public and on-site workers.		Not triggered	The Project is still undergoing detailed design (B. Toohey pers. comm).	
HAZ2	The following lightning protection measures will be included in the detailed design: • Each structure will be equipped with earthing fixtures • Each transmission line will have two earthing lines at the top of each structure to provide protection to the conductors from lightning strike • Lightning masts will be installed at the substation.		Not triggered	The Project is still undergoing detailed design (B. Toohey pers. comm).	
HAZ3	A Prepare-Act-Survive bushfire response plan will be prepared for the project. The plan will be prepared according to Planning for Bush Fire Protection (RFS, 2019) and in consultation with NPWS, FCNSW and Snowy Valleys Bush Fire Management Committee. The fire prevention/mitigation strategies within Bago State Forest will be generally in accordance with Forest Practices Codes including the Standard Operating Procedure -Plantation Harvesting, Haulage and Site Preparation Fire Restrictions (Fire Prevention 19/51). The plan will include responsibilities associated with and details of • Site specific hazards and risks for the project area • Procedures to maintain bushfire awareness • Bushfire mitigation measures • Fire preparedness actions including: • Evacuation triggers • Evacuation routes • Mustering points • Neighbourhood safer places and refuges of last resort • Instructions for sheltering in-vehicle if there are no other options.	Emergency Plan (rev 0.07) dated 25/06/2024 Bushfire Plan (rev 0.06) dated 30/08/2023	Compliant	Confirmed during the Initial Construction Audit, bushfire risks and response are addressed in the Emergency Plan. The Bushfire Plan listed as Appendix H of the Emergency Plan addresses the requirements set out by Condition HAZ3.	
HAZ4	• For the main construction compounds, a minimum of 40 metres clearance is required between fuel/chemical storage points and woody vegetation. The construction compound buildings will have at least 20 metres clearance to the vegetation. • Firefighting equipment will be maintained at and/or accessible to all active construction sites during the declared bushfire danger season, and site personnel trained in its use. Equipment will be appropriate to the activities being conducted and the fire danger at the time of works, but as a minimum must include: ○ 4WD Striker with slip-on water unit, equipped with diesel pump and hoses ○ Extinguishers ○ Knap sacks ○ Hand tools (e.g. fire rakes). • Any vegetation cleared as part of these works will be removed from site (as much as reasonably practicable), or otherwise processed to avoid excessive bushfire fuel accumulation as agreed with FCNSW and NPWS.		Compliant	It was observed during the site inspection fire equipment was maintained and accessible. Equipment included fire extinguishers and furphy's. In response to a recommendation outlined in Construction Aduit 2 water supply tanks were observed to be full and signposted (sighted). The Oncon Refuelling Procedure was revised during the audit period to include a minimum 40-metre clearance between fuel/chemical storage areas and woody vegetation, in response to a recommendation from Construction Audit 2 (J. Snape pers. comm).	
HAZ5	• All chemicals or other hazardous substances will be stored in a bunded area and away from any natural drainage lines. The capacity of the bunded area will be at least 130% of the largest chemical volume contained within the bunded area. The location of the bunded enclosure/s will be shown on Site Plans. • The storage, handling and use of dangerous goods and hazardous substances will be carried out in accordance with the WHS Act and Regulations, the Storage and Handling of Dangerous Goods Code of Practice (WorkCover NSW, 2005) and relevant Australian Standards		Compliant	During the site audit inspection, it was observed that chemicals and other hazardous substances were stored in a bunded area and away from any natural drainage lines.	

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
HAZ6	• Routine condition monitoring and risk-based maintenance of project elements to minimise the incidence of ignitions from asset failures • Ongoing vegetation management will be in accordance with TransGrid's operational vegetation monitoring and management procedures. This will include regular inspection and maintenance of trees and woody vegetation within the transmission corridor to provide safe clearance distance to the overhead conductors, and maintenance of the substation APZ • The APZ surrounding the substation will be completely cleared with vegetation managed to approximately 100 mm in height • Ongoing risk management of trees located outside the easement that have potential to strike the conductor if they were to fall • Access tracks will be maintained to facilitate ongoing access to transmission structures for maintenance. It is recommended that these tracks are to be maintained to the standards of a Category 9 fire trail (RFS, 2016) to allow fire response in the area.		Not triggered	Conditions relate to the operational phase of the Project.	
HAZ7	Hot work (activities involving high temperatures) and fire risk work (activities involving heat or with the potential to generate sparks) will be managed under TransGrid procedures.	Bushfire Plan Appendix C – Hot Work And Fire Risk Work Procedure dated 13/03/2023	Compliant	During the Initial Construction Audit, it was confirmed that the procedure for Hot Work and Fire Risk Work is included as Appendix C of the Bushfire Plan. This procedure addresses the requirements of Condition HAZ7. However, there is **no verifiable evidence that the procedure has been reviewed during the audit period**. As outlined in Section 13, the procedure must be reviewed every 12 months. The current version is dated 13 March 2023. **Recommendation: It is recommended that the Hot Works procedure be reviewed prior to the start of the next bushfire season.**	
Social and Economic					
SE1	A CSEP will be prepared and implemented to help provide timely and accurate information to the community during construction. The plan will include (as a minimum): • Mechanisms to provide details and timing of proposed activities to key stakeholders including residents, business owners, NPWS, FCNSW, emergency service, health and medical facilities, visitors, accommodation providers and annual event organisers, recreational users and motorists including changed traffic and access conditions and amenity impacts • Process for receiving and responding to queries and complaints regarding the project's construction.		Compliant	Confirmed during the Initial Construction Audit requirements included in Condition SE1 are addressed in the Stakeholder and Community Engagement Plan. No complaints have been received during the audit period (B. Toohey pers. comm).	
SE2	• A worker accommodation strategy will be prepared for the project to manage demand for tourist accommodation from the construction workforce during the construction phase and postconstruction • Maximise the use of the Snowy 2.0 works accommodation where possible to minimise demand for local accommodation • **C**onsider local business opportunities in project procurement practices, including encouraging contractors to source local goods and services, where possible • Identify and communicate to local communities (prior to and during construction) opportunities and requirements for work on the project.		Compliant	Confirmed during the Initial Construction Audit a Workers Accommodation Strategy has been prepared for the Project.	
SE3	• Development, monitoring and review of project incident response plans, including ongoing consultation with emergency service providers about changes to local access and potential delays and disruptions • Preparation of a workforce health and safety plan that includes measures for responding to health, medical and safety incidents during construction.		Compliant	Confirmed during the Initial Construction Audit a Health and Safety Management Plan has been prepared for the Project whilst the development, monitoring and review of project incident response plans is included in the Stakeholder and Community Engagement Plan.	
SE4	The operation and maintenance of the portion of the project in KNP will be carried out in accordance with any access and operational protocols established between TransGrid and NPWS.		Noted		

Snowy 2.0 Transmission Connection Project (Amendment Report – Updated Mitigation Measures (Transgrid 2022))					
Mitigation Measure	**Requirement**	**Evidence Collected**	**Compliance Status**	**Independent Audit Findings and Recommendations**	**Unique ID on NC**
Waste					
WR1	Further consultation with local waste facilities will be carried out during detailed design to further determine potential disposal locations		Compliant	Confirmed during the Initial Construction Audit consultation has been undertaken with local EPA licenced waste facilities.	
WR2	• A construction waste management plan (CWMP) will be prepared for the project and outline appropriate management procedures. It will include, but not be limited to: • Identification of the waste types and volumes that are likely to be generated by the project • Adherence to the waste minimisation hierarchy principles of avoid/reduce/ reuse/recycle/dispose Waste management procedures to manage the handling and disposal of waste, including vegetation, spoil, unsuitable material or unexpected waste volumes • Identification of reporting requirements and procedures for tracking of waste types and quantities A resource management strategy detailing the process to identify reuse options for surplus materials.	Waste Management Strategy (rev 0.09) dated 05/11/2024	Compliant	Confirmed during the Initial Construction Audit a Waste Management Strategy which is included as Appendix C of the Contaminated Lanad Management Plan has been prepared for the Project and addresses the requirements of this condition.	
WR3	Excess spoil generated in project area east will be transported by truck to Lobs Hole where it will be managed and disposed of by Snowy Hydro (in accordance with the methods described in the Snowy 2.0 Major Works EIS and any conditions of their approval).	Soil And Water Management Plan (rev 0.10) Appendix A Spoil Management Plan (rev 0.08) dated 05/11/2024	Compliant	Confirmed during the Initial Construction Audit excess spoil management is outlined in Section 3.4 of the Spoil Management Plan.	
WR4	All waste, including surplus soils, which cannot be reused will be classified in accordance with the Waste Classification Guidelines (EPA, 2014), removed from the site and disposed of at a facility that can lawfully accept the waste in accordance with the POEO Act and POEO Waste Regulation.	Waste Management Strategy (rev 0.09) dated 05/11/2024	Compliant	Confirmed during the Initial Construction Audit requirements of this condition are included in the Waste Management Strategy.	
WR5	Operational waste will be managed in accordance with TransGrid Waste Management Procedures and associated Work Instructions.		Not triggered	Conditions relate to the Operational phase of the Project.	
Cumulative Impacts					
CI1	• Regular consultation will be carried out with nearby/adjoining projects and key stakeholders during the detailed design and construction phase to review potential cumulative impacts and timing of activities that have potential cumulative impacts • As far as practical construction activities will be coordinated and staggered with Snowy Hydro to minimise cumulative impacts in the project area west • Engagement with Snowy Valleys Council and Snowy Monaro Regional Council will be ongoing regarding impacts on local infrastructure (including accommodation, services)		Compliant	Confirmed during the Initial Construction Audit, consultation responsibilities are outlined in the Stakeholder and Community Engagement Plan. Consistent with the Construction Audit 2, the Interface Management Plan continues to be implemented during the audit period with Interface meetings held weekly to discuss work scope activities and plan strategies to develop best solutions and prevent stoppages of work for all parties (J. Snape pers. comm).	

APPENDIX 5

Site Inspection Photographs

Plate 1: Example 1 - Clearing observed extending beyond delineated area along Track 5C (Inspection Date: 13/03/2025).

Plate 2: Example 2 - Clearing observed extending beyond delineated area along Track 5C (Inspection Date: 12/03/2025).

Plate 3: Example 3 - Clearing observed extending beyond delineated area along Track 5C (Inspection Date: 12/03/2025).

Plate 4: Blue ropes in place of red ropes was identified along Track 5C (Inspection Date: 12/03/2025).

Plate 5: Overview of partial clearing area located in Track 8 (Inspection Dated: 12/03/2025).

Plate 6: Comparison of total and partial clearing areas. Partial clearing areas showing persistent groundcover vegetation located within Track 7 (Inspection Date: 12/03/2025).

Plate 7: Track 1 Partial Clearing Zone – Low density of coarse woody mulch observed. Steeper slope has limited mulcher access to the area. Fewer large trees present in the original PCT (Inspection Date: 12/03/2025).

Plate 8: Areas of partial clearing located within Track 9 (Inspection Date: 12/03/2025).

Plate 9: Track 9 displays reduced mulch cover and depth compared to adjacent patches, with noticeably better ground cover retention in some areas. Signs of compaction and horse activity are also evident (Inspection Date: 12/03/2025).

Plate 10: Track 9 Pad 20 shows mulch depth up to 200 mm, with up to 90% cover in some areas. Blackberry presence noted (Inspection Date: 12/03/2025).

Plate 11: Track 9 Pad 20 shows mulch depth up to 200 mm, with up to 90% cover in some areas. (Inspection Date: 12/03/2025).

Plate 12: Partial clearing zones observed on Track 9 Pad 18. Mulch cover decreases with distance from the tower pad. No shrub cover present; some ground cover regeneration observed. Large mulch debris covers approximately 40%, with variable depth (Inspection Date: 12/03/2025).

Plate 13: Some partial clearing zones observed on Track 9 indicate less mulch cover and depth compared to adjoining patches, some regeneration of ground covers, compaction evident, horse activity evident (Inspection Date: 12/03/2025).

Plate 14: Partial clearing zones observed on Track 9 Pad 18. Mulch cover decreases with distance from the tower pad. No shrub cover present; some ground cover regeneration observed. Large mulch debris covers approximately 40%, with variable depth (Inspection Date: 12/03/2025).

Plate 15: Track 9 Pad 18 – Mulch cover decreases with distance from the tower pad. No shrub cover present; some ground cover regeneration observed. Large mulch debris covers approximately 40%, with varying depth (Inspection Date: 12/03/2025).

Plate 16: Track 9 shows a patch with reduced mulch cover and depth compared to adjoining areas. Ground cover retention is notably better, with evidence of compaction and horse activity (Inspection Date: 12/03/2025).

Plate 17: Partial clearing zones observed on Track 9 Pad 18. Mulch cover decreases with distance from the tower pad. No shrub cover present; some ground cover regeneration observed. Large mulch debris covers approximately 40%, with variable depth (Inspection Date: 12/03/2025).

Plate 18: Partial clearing zones observed on Track 9 Pad 18. Mulch cover decreases with distance from the tower pad. No shrub cover present; some ground cover regeneration observed. Large mulch debris covers approximately 40%, with variable depth (Inspection Date: 12/03/2025).

Plate 19: Wallaces Creek – Booroolong Frog Habitat (Inspection Date: 12/03/2025).

Plate 20: Erosion and sediment controls leading into Wallaces Creek (Inspection Date: 12/03/2025).

Plate 21: Erosion and sediment controls located on edge of Wallace Creek. Sediment fences were observed not embedded (Inspection Date: 12/03/2025).

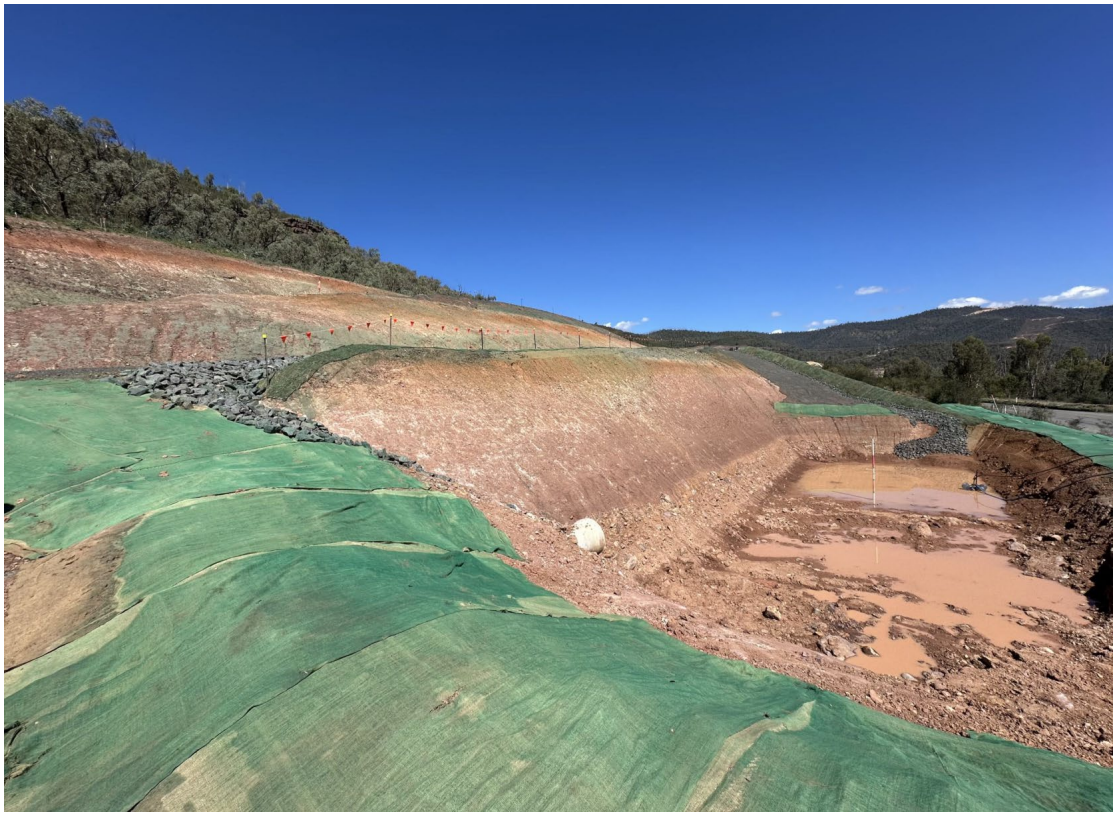

Plate 22: Sediment basin located near the base of Track 8 (Inspection Date: 12/03/2025).

Plate 23: Rock drains located along the western alignment (Inspection Date: 12/03/2025).

Plate 24: Rock drains located along the western alignment (Inspection Date: 12/03/2025).

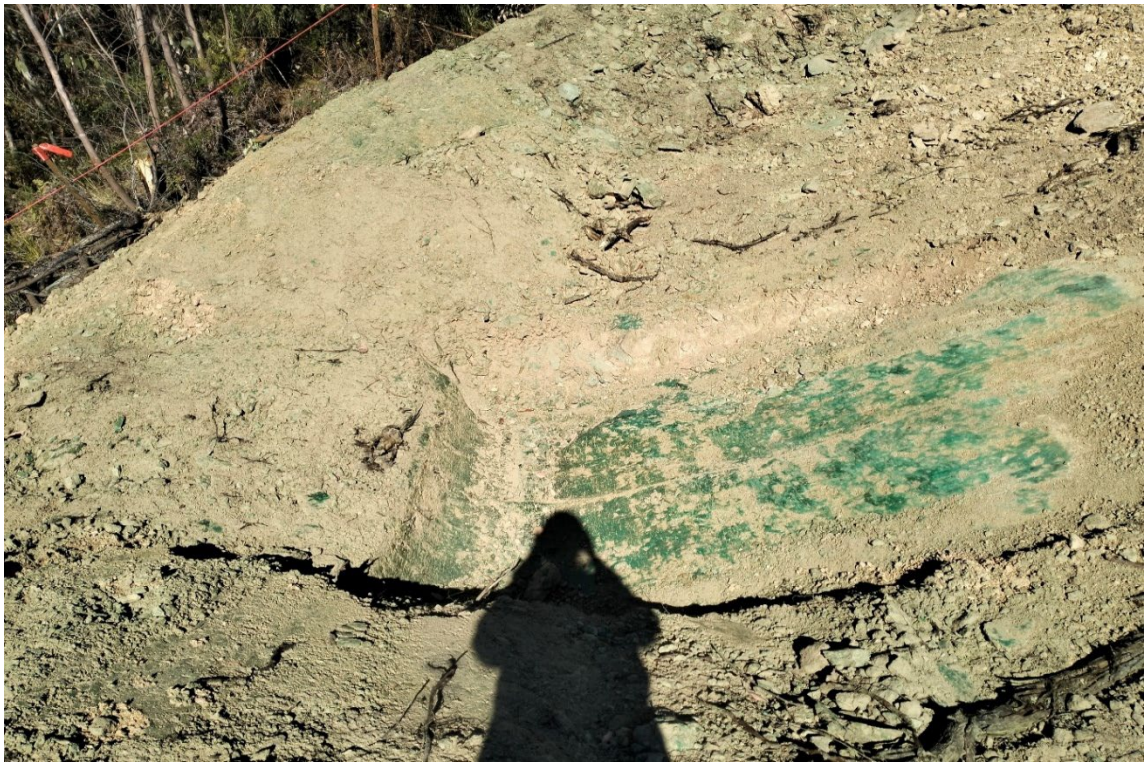

Plate 25: Track 4 Sediment trap, evidence of soil binder present however outlet is unlined (Inspection Date: 12/03/2025).

Plate 26: Track 4 Sediment trap, evidence of soil binder present however outlet is unlined (Inspection Date: 12/03/2025).

Plate 27: Track 4 Sediment trap, evidence of soil binder present however outlet is unlined (Inspection Date: 12/03/2025).

Plate 28: Track 5 Sediment Trap with evidence of sediment overflow in outlet (Inspection Date: 12/03/2025).

Plate 29: Interior view of the bunded chemical storage area at the Maragle Project Construction Compound (Inspection Date: 13/03/2025).

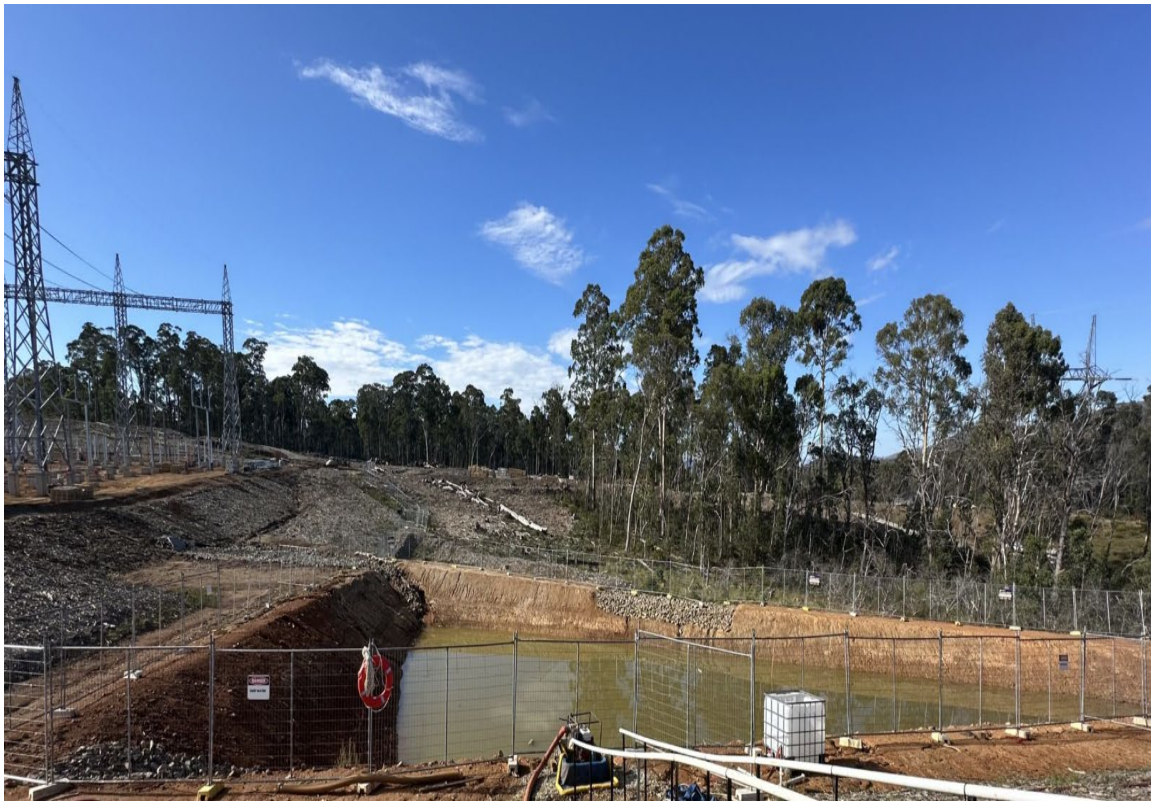

Plate 30: Sediment basin at the Maragle Project Construction Compound (Inspection Date: 12/03/2025).

Plate 31: Overview of multiple gantries constructed at the Maragle Substation Project Area (Inspection Date: 13/03/2025).

Plate 32: Ongoing installation of the auxiliary building at the Maragle Substation Project Area (Inspection Date: 13/03/2025).

Plate 33: Construction plant observed was in good condition, appearing to be well maintained and operated in a safe and efficient manner located within Maragle Substation Project Area (Inspection Date: 13/03/2025).

Plate 34: Wheel washing station located within the Maragle Project Construction Compound (Inspection Date: 13/03/2025).

Plate 35: Rumble girds installed at the entrance and exit of Track 10 (Inspection Date: 12/03/2025).

Plate 36: Signposted Biosecurity Zones with QR codes observed in Track 10 (Inspection Date: 13/03/2025).

Plate 37: Disinfection stations with accompanying QR codes observed in Track 10 (Inspection Date: 12/03/2025).

Plate 38: Waste segregated into designated waste bins located within Lobs Hole Project Compound (Inspection Date: 12/03/2025).

Plate 39: Water supply tank at Lobs Hole Project Compound full and signposted (Inspection Date: 12/03/2025).

Plate 40: Firefighting equipment located within Lobs Hole Project Compound (Inspection Date: 12/03/2025).

Plate 41: General skip bin located at Lobs Hole Project Compound (Inspection Date 12/03/2025).

Plate 42: Dust observed on deck of Sheep Station Creek Bridge (Inspection Date 12/03/2025).

Plate 43: Dirty water diversion with rock checks located on Track 8 (Inspection Date: 12/03/2025).

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