



MOSS
ENVIRONMENTAL

GUNNEDAH SOLAR FARM

INDEPENDENT AUDIT

Moss Environmental
24 Fitzroy Street
Tamworth NSW 2340

Gunnedah Solar Farm
765 Orange Grove Road
Gunnedah NSW 2380

Lead Environmental Auditor: Shonelle Gleeson Willey

Application number: SSD- 8658

Prepared: 29 March 2021

Issued date: 21/05/2021

Certified by: Shonelle Gleeson-Willey

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Rev	Date	Prepared by	Reviewed by	Approved by	Remarks
A	17/05/2021	Angus McIntosh & Shonelle Gleeson-Willey	Shonelle Gleeson-Willey	Shonelle Gleeson-Willey	Draft for comment
1	21/5/2021	Shonelle Gleeson-Willey	Paul Cannington	Shonelle Gleeson-Willey	Final for submission to DPIE
2	13/7/2021	Shonelle Gleeson-Willey	Paul Cannington	Shonelle Gleeson-Willey	Address comments from DPIE

1 CONTENTS

1	EXECUTIVE SUMMARY	5
2	INTRODUCTION	6
2.1	Background	6
2.2	Project Details	6
2.3	Audit Team	7
2.4	Audit Objectives	7
2.5	Audit Scope	7
2.6	Audit Period	8
3	AUDIT METHODOLOGY	9
3.1	Selection and Endorsement of Audit Team	9
3.2	Independent Audit Scope of Development	9
3.3	Opening Meeting	9
3.4	Conduct of Audit	10
3.5	Site Interviews.....	10
3.6	Site Inspections	11
3.7	Consultation	12
3.8	Compliance Status Descriptors	12
4	AUDIT FINDINGS.....	13
4.1	Approval and Document List.....	13
4.1.1	Report / Plans.....	13
4.1.2	Protocols/Policies/Registers	13
4.1.3	Designs/Drawings.....	13
4.1.4	Presentations/Inductions.....	14
4.1.5	Community Notifications	14
4.1.6	Environmental Inspections.....	14
4.1.7	Flood Modelling and Water Management.....	14
4.1.8	Mobile Plant	14



4.1.9	Road Management and Dilapidation	14
4.1.10	Section 138.....	14
4.1.11	Erosion and Sediment Control	15
4.1.12	Site Plot Plan	15
4.1.13	Traffic Management.....	15
4.1.14	Emails	15
4.1.15	Approval documents/Letter	15
4.1.16	Other	16
4.2	Compliance Performance.....	16
4.3	Summary of Agency Notices, Orders, Penalty Notices or Prosecutions	16
4.4	Non-Compliances	17
4.5	Previous Audit Recommendations.....	17
4.6	EMP, Sub-Plans and Compliance Documents	17
4.7	Environmental Performance	17
4.8	Complaints	17
4.9	Incidents	17
4.10	Actual versus Predicted Environmental Impacts	18
4.11	Site Inspection.....	18
4.12	Key Strengths	18
5	RECOMMENDATIONS.....	20
5.1	Non-compliances.....	20
5.2	Action Items	21
5.3	Opportunities for Improvement	21
6	CONCLUSION	22
7	APPENDIx	23
7.1	Appendix A – Independent Audit Table	23
7.2	Appendix B -Planning Secretary Audit Team Agreement	24
7.3	Appendix C- Consultation.....	25



7.4 Appendix D – Meeting Attendee Register 26

7.5 Appendix E – Independent Audit Declaration Form 27

7.6 Appendix F – Site Inspection and Photographs 28

DISCLAIMER..... 29

PUBLICATION DETAILS 29

CONTACT US..... 29



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1 EXECUTIVE SUMMARY

The Gunnedah Solar Farm is located near the township of Gunnedah, in the North West of regional New South Wales. The project is a State Significant Development (SSD-8658) and was granted development approval by the NSW State Government in March 2019.

PCL engaged Moss Environmental to undertake independent environmental audits of the construction site in compliance with the SSD 8658 conditions of consent and Independent Audit-Post Approval Requirements (PAR, 2020).

The Post Approval Independent Audit was conducted on 27th March 2021 in accordance with the Department of Planning, Industry and Environment's, (The Department or DPIE) *Independent Audit Post Approval Requirements (2018)* and the *Moss Environmental Standard Operating Procedure-Independent Auditing for State Significant Projects*.

The audit was undertaken using a three-step process of pre-assessment, site audit and inspection followed by gathering of requested documentation.

Overall, the project environmental performance is in compliance with Development Conditions of Consent SSD 8658, and Post-approval requirements and met with the following key strengths noted;

- Internal and external community consultation is regular and well delivered;
- Complaints have been recorded and responded to appropriately;
- Traffic of both heavy and light vehicles is well managed, documented and rules adequately policed;
- Dust is managed well via a regular timetable of rounds by the water carts on an on-call basis;
- Waste segregation is in place, communicated well to site staff;
- Landscape plantings are on-track and remnant vegetation barriers have been implemented and
- Documentation is well managed, up to date and complete.

Gunnedah Solar Farm achieved a score of 96.43% compliance using the Moss Environmental auditing system which is based on the *Independent Audit Post Approval Requirements (2018)* and the *Moss Environmental Standard Operating Procedure-Independent Auditing for State Significant Projects*.

The audit resulted in;

- 2 non-compliance;
- 2 action item to be assessed during the next audit.

2 INTRODUCTION

2.1 BACKGROUND

The Gunnedah Solar Farm is located near the township of Gunnedah, in the North West of regional New South Wales. The project is a State Significant Development (SSD-8658) and was granted development approval by the NSW State Government in March 2019.

The Gunnedah Solar Farm (GSF) is being developed by Canadian Solar Inc through their wholly owned company Gunnedah Solar Farm Pty Ltd.

The GSF was granted Development Consent (SSD 8658) on the 12th of March 2019 by the Department of Planning, Industry and Environment NSW (DPIE). The approved development consent allows for the development of a large-scale solar farm located at 765 Orange Grove Road, Gunnedah, to be constructed within the approved 'array area' as illustrated in the approved 'General layout of Development'.

The project is aiming to complete construction and begin operations in late 2021. The project will incorporate a 154MW solar Photovoltaic (PV) system and use a single axis tracking system that utilizes ground mounted panels to generate energy for electricity consumption. It is projected that the site will generate up to 309GWh which is equivalent to the consumption needs of over 48,000 homes.

PCL engaged Moss Environmental to undertake independent environmental audits of the construction site in compliance with the SSD 8658 conditions of consent and Independent Audit-Post Approval Requirements (PAR, 2020).

2.2 PROJECT DETAILS

Description	Details
Project Name	Gunnedah Solar Farm
Project Application Number	SSD 8658
Project Address	765 Orange Grove Road, Gunnedah
Project Phase	Construction
Project Activity Summary	development of a 154MW solar Photovoltaic (PV) solar farm

Table 1 Project details

2.3 AUDIT TEAM

Details of the Moss Environmental auditor for this audit was submitted to The Department. Endorsement by DPIE of the following auditor was granted prior to the conduct of the audit, on 22nd January 2021 by Ms Miles. Refer to **Appendix B**.

Name	Company
Shonelle Gleeson-Wiley	Moss Environmental

Table 2 Audit Team

2.4 AUDIT OBJECTIVES

The objectives of this audit were to assess PCL Gunnedah Solar farm against the requirements of the approval conditions in SSD-8658, in accordance with the Departments *Independent Audit Post Approval Requirements (2018)*.

2.5 AUDIT SCOPE

The scope of this audit comprised a review of the Gunnedah Solar Farms systems, processes, and procedures to assess compliance with:

- Development consent SSD-8658;
- Independent Audit Post Approval Requirements;
- Construction Environmental Management Plan and sub plans;
 - Appendix A Environmental Management Strategy;
 - Appendix C PCL Environment Policy;
 - Appendix D Local Resource Plan;
 - Appendix E Community Engagement Plan;
 - Appendix F Gunnedah Chance finds Protocol;
 - Appendix G Traffic Management Plan;
 - Appendix H Landscaping Plan;
 - Appendix I Bushfire Management Plan;
 - Appendix J PCL Health Safety and Environment Plan;
 - Appendix K Emergency Response Plan;
 - Appendix L Water, Erosion and Sediment Management Plan;
- Water Management Plan;
- Complaints Procedure;
- Environmental Impact Statement mitigation measures;
- All environmental licences and approvals excluding EPL's
 - Section 138 certificate;
 - Permit and Works consent

The Post Approval Independent Audit was conducted on 27th March – 30th March 2021 in accordance with the Departments *Independent Audit Post Approval Requirements (2018)* and the *Moss Environmental Standard Operating Procedure-Independent Auditing for State Significant Projects*. The scope of the audit was determined prior to the

Preliminary Audit being conducted and is consistent with the conditions of Consent and Independent Audit-Post Approval Requirements (PAR, 2020) included as the site audit in **Appendix A**.

2.6 AUDIT PERIOD

Under Schedule 4, Condition 7 the audit “is to be conducted within 6 months of construction, or as directed by the Secretary”. As outlined by the Department, it is noted that the commencement of construction occurred on the 1st of October 2020. In accordance with this condition, the site audit was commenced on the 27/3/2021.

As the audit period is specifically outlined in the conditions of consent it is acknowledged that the conditions of consent have prevailed over the Independent Audit Post Approval Requirements (2020).

This was the first independent environmental audit carried out by Moss Environmental on the project, the audit covered review of environmental documentation and records for works between 1st October 2020 and 30th March 2021.

This report is based on the results of sampling and supplied documentation/records during the pre-audit document review (27th March) and review of site activities on the days of the site audit and inspection (29th and 30th March 2021).

3 AUDIT METHODOLOGY

3.1 SELECTION AND ENDORSEMENT OF AUDIT TEAM

The Audit Team has been approved by the Planning Secretary and endorsed by the NSW Government, DPIE.

See **Appendix B** - Gunnedah Solar - Auditor Endorsement (SSD-8658) Independent Environmental Audit letter

3.2 INDEPENDENT AUDIT SCOPE OF DEVELOPMENT

This audit has been prepared, undertaken and finalised in accordance with the Departments *Independent Audit Post Approval Requirements (2020)* and the relevant conditions of consent and Post Approval Requirements. Moss Environmental developed the audit scope and a checklist based on the Project Development Consent Requirements SSD 8658, and consultation with the Department. Refer to **Appendix A and B**. As outlined by the Department, this audit notes that the project commenced construction on the 1st of October 2020.

3.3 OPENING MEETING

The audit was conducted through a combination of remote auditing (through a document request) and a site audit and inspection.

An opening meeting was held at the site on 29th March 2021 at 10am with PCL project personnel and the Moss Environmental auditor, as per the Audit Meeting Attendee Register. Refer to **Appendix D** of this report.

The opening meeting was attended by the following:

- Jeff Ewert- Senior Construction Manager;
- Landon Douglas- Project Manager, Construction;
- Sri Sahaarengan- Project Manager, Field support;
- David Gooding- Construction Manager;
- Mark Wintle- Electrical Supervisor and Civil Coordinator; and
- Paul Cannington- HES Supervisor.
- Shonelle Gleeson-Willey – Moss Environmental Lead Auditor.

Key items which were discussed include:

- Confirmation of the type of audit including objectives, scope and criteria;
- The audit timetable;
- Confirmation of the audit plan;
- Confirmation that resources for the audit were available;
- Explanation of the audit methodology;
- Presentation of all the Preliminary Audit Findings;
- Proponents responsibilities for the audit;
- Confirmation of the status of previous audits;
- Proponents expectations and objectives.

3.4 CONDUCT OF AUDIT

The audit activities included the following:

- Review of project documentation to verify compliance with Development Consent SSD 8658;
- Conducted the site audit by following the audit procedure and templates that were prepared by Moss Environmental based on the conditions of consent;
- interviewing site personnel and a review of evidence provided to demonstrate compliance; and
- Conducted a site inspection to review implementation of mitigation measures, environmental controls and post approval requirements.

Any findings from the audit and site inspection, and any action items were discussed with site personnel at the closing meeting.

The closing meeting was held on 30th March 2021 with representatives from PCL. General feedback and the findings of the audit were discussed.

3.5 SITE INTERVIEWS

Site interviews were conducted using an interview template developed specifically for Gunnedah Solar Farm and to reflect the Departments requirements and special areas for investigation through the audit. Site interviews were conducted with all project staff who attend site regularly and are in a managerial role. These included;

- Jeff Ewert- Senior Construction Manager;
- Landon Douglas- Project Manager, Construction;
- Sri Sahaarengan- Project Manager, Field support;
- David Gooding- Construction Manager;
- Mark Wintle- Electrical Supervisor and Civil Coordinator; and
- Paul Cannington- HES Supervisor.

The results of the site audit interviews are provided in **Appendix C** and summarised below.

During the interviews staff were asked a series of questions focused on traffic management, Landscaping, Dust and general air quality management, chain of command, position descriptions, incident management and risk management. The responses from all staff were consistent, providing a very good level of certainty regarding the internal communications of the team.

The first section of questions asked were looking for details relating to the Implementation of the Traffic Management Plan (TMP). Every respondent was confident that the TMP and Drivers Code of Conduct was generally followed and effective. To enforce these there are random and in response to complaints, spot patrols on the bridge. During these patrols photographs have been taken of the trucks not following the TMP. These photographs are then reviewed by Mr. Cannington who determines if the truck is for the PCL GSF project. During one such patrol a truck was photographed and determined to be for the GSF project. The truck crossed the bridge and was subsequently self-reported to DPIE. The transport company was contacted by Mr. Cannington and resent the TMP and Code of Conduct.

The majority of respondents were aware of one traffic complaint, which was made by a local person. After an investigation it was found that this truck was not from or for the GSF project.

The auditor asked a question about the monitoring and response to climate change and wet weather on the project. The respondents were able to talk at length about the site's closed loop dewatering system which is diverted to a large farm dam for use by the landowner. Monitoring for rain is conducted regularly through the Bureau of Meteorology. The sites flood response plan has not yet been enacted.

The next section of questions related to the Landscaping Plan. All respondents were able to talk about the contractor who has been engaged to complete the planting, and the one-month timeframe for the commencement of planting.

The next section of questions related to dust and air quality management. According to all respondents, dust is managed via two water carts with scheduled dependent on the daily site activities. Air quality management is discussed at pre-start and in the daily site meetings. There are enforced speed zones on site. All respondents believe that the dust is being adequately managed on-site.

The next section related to chain of command. All respondents adequately discussed the fact that the Project Approval is in the name of Canadian Solar (CS) and that PCL has a very active relationship with CS.

The next section asked questions related to Position Descriptions. Most respondents stated that they have a written position description that is also outlined in the Environmental Management Strategy.

The next section investigated incident management, and respondents were asked to discuss their role in incident management for the project. Each respondent has a slightly different understanding of incident management on the project, and everyone has a slightly different role. PCL has an incident reporting system through the companies Safety Management Centre software package.

The last section related to Risk Management, particularly environmental risk. This question has no right or wrong answer and is responses are based on each individuals knowledge and risk appetite. Most respondents listed flooding as their major concern.

3.6 SITE INSPECTIONS

The site inspection was carried out by the auditor and Mr. Paul Cannington on 30th March 2021. The inspection assessed the implementation of environmental controls and concentrated on the following general areas from the conditions of consent;

- Public Property;
- Traffic Management;
- Vegetation Buffer;
- Land Management;
- Dust;
- Visual amenity;
- Flood management;
- Operating conditions;
- Water pollution;
- Hazards;
- Storage and handling of dangerous goods;
- Waste;

- Site Training; and
- The EIS mitigation measures

The site inspection notes and photographs can be found in **Appendix F**.

Overall, the site is compliant with the conditions of consent assessed as part of the site inspection. There were two areas for improvement with subsequent recommendations noted, one of which has been included as a non-compliance with action item. Firstly there is a need for more extensive training of the staff carrying out the environmental inspections. The PCL site environmental inspections are currently completed by a variety of staff and sub-contractors. The template is based on a risk assessment model. Therefore, if no hazards are identified as possible risks, then there are no entries in the inspection. Currently staff and sub-contractors have not been trained in the risks to inspect for. Secondly the progressive rehabilitation is showing poor strike rate and patchy germination which does not meet the 70% coverage required by the NSW Blue Book and Best Practice Erosion and Sediment Control Manual (International Erosion Control Association, 2008).

3.7 CONSULTATION

Consultation with DPIE was conducted on 9th February 2021 prior to the audit. DPIE requested that during the audit particular attention was given to the following:

- Schedule 3 Condition 9 – implementation of the Traffic Management Plan;
- Schedule 3 Condition 11 – implementation of the Landscape Management Plan; and
- Schedule 3 Condition 16 – onsite air quality management

Refer to **Appendix C** for records of the consultation.

3.8 COMPLIANCE STATUS DESCRIPTORS

The following audit criteria were used for the rating of audit findings.

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

Table 3 Compliance Status Descriptors (PAR, 2020)

4 AUDIT FINDINGS

4.1 APPROVAL AND DOCUMENT LIST

The following documents, email correspondence and plans were reviewed as part of the audit:

4.1.1 REPORT / PLANS

- Gunnedah Solar Farm, Environmental Impact Statement
- Gunnedah Solar Farm, Construction Environmental Management Plan
- Appendix A - Additional Consultation Evidence
- Appendix B GSF Community Engagement Plan
- Appendix GG GSF Bushfire Management Plan;
- Appendix LL - GSF Mobile Plant Management Plan
- Appendix JJ - GSF Traffic Management Plan
- Appendix Y GSF Emergency Response Plan Rev 003
- GSF Environmental Management Strategy
- GSF-Procurement-Management-Plan-REV-000-2
- GSF Landscape Management Plan
- Water Management Plan (Phase 1)
- Water Management Plan (Phase 2)
- Aboriginal Heritage Assessment

4.1.2 PROTOCOLS/POLICIES/REGISTERS

- Gunnedah Chance Find Protocol FINAL
- PCL Constructors Pacific Rim Pty Ltd - Complaints Procedure
- Complaints Register 280221;
- Induction register;
- Environmental Checklist
- Gunnedah - Project Roles and Responsibilities Matrix - 2020.11.20
- Gunnedah HSE Roles and Responsibilities Rev 5 - 9 Dec 2020
- HSE Advisory - Environmental Roles and Responsibilities
- Gunnedah Solar Farm - Waste Management Tracking

4.1.3 DESIGNS/DRAWINGS

- Civil - IFC Civil_Site Plan
- Electrical Layout - dwg_727160_GUN_E200
- Piling and Mechanical - Gunnedah Solar - 1P SAT Site Layout Option I (Rev.15A.1)
- Civil Design - ST-CE-001
- Electrical Design - EL-DC_003
- 01_20200910_3600727160_GunnSolar_PrelimDesign_WMP_FINAL_collated_red
- 01_20200920_3600727160_WMP_RespLetter2_DW_FINAL_collated

- Gunnedah O&M Building Layouts
- Fire water tank location

4.1.4 PRESENTATIONS/INDUCTIONS

- Induction – Short duration worker;
- Induction HSE orientation checklist – Australia;
- Gunnedah Solar Farm Delivery Driver Information Sheet;
- Gunnedah Solar Farm Delivery Driver Project Safety Overview;
- Gunnedah Solar Farm Visitor Project Safety Overview;
- Civil Presentation - Lessons Learned
- Gunnedah Solar Farm Project Environmental Overview

4.1.5 COMMUNITY NOTIFICATIONS

- Notice to Residents - Access Road Construction – Final
- Notice to Residents – Gunnedah Solar
- Newspaper Notice

4.1.6 ENVIRONMENTAL INSPECTIONS

- Inspection - Post Rain event
- Inspection - Supervisor Action

4.1.7 FLOOD MODELLING AND WATER MANAGEMENT

- Constraints Map, 17 September 2018
- Fence Configuration 5 Memo
- SY20137 Report Review of Hydrology Rev00_Rev0
- SY20137S001 Report Hydraulic Modelling Rep ID 20_Rev00
- Water Levels at Fence Boundary

4.1.8 MOBILE PLANT

- GSF Mobile Plant Register
- GSF-PIL - Plant Prestarts 25.01-30.1
- Piling Rig Acoustic Report
- Stralis Pre-Start Inspections

4.1.9 ROAD MANAGEMENT AND DILAPIDATION

- Gunnedah Solar Farm Road Inspection Report-Orange Grove Road- 03-02-2021
- PCL-GSF HV Route- Pavement Dilapidation Report (Rev 0)

4.1.10 SECTION 138

- GSF PCL Constructors - Permit and Works Consent - Executed – Signed

4.1.11 EROSION AND SEDIMENT CONTROL

- Current Silt Fence Redline Drawings
- dwg_3600727160_20210412_fence_C-500
- Fencing Plan
- Sediment and Fencing Design
- Sediment Control Plans

4.1.12 SITE PLOT PLAN

- Constraints Map, 17 September 2018
- Site Plot Plan Rev 2

4.1.13 TRAFFIC MANAGEMENT

- GSC Corres - Traffic Management Plan
- GSF -PCL- Access Road Truck Movement Schedule 04-02-2021
- Gunnedah Solar Farm Delivery Driver Information Sheet
- Gunnedah Solar Farm Delivery Driver Project Safety Overview
- NHVR - Oversize Dimension Permit No. 447540V2
- Email – Canadian Solar Farm – non-compliance email conversation 28th Jan 2021 – 12th Feb 2021

4.1.14 EMAILS

- Email – Gunnedah Solar Farm Emergency Preparedness;
- Email - Gunnedah Solar Farm - Post Approval Document Received - (SSD-8658-PA-11)
- Email - Gunnedah Solar Farm - Post Approval Document Received - (SSD-8658-PA-13)
- Email - RE Gunnedah Solar Farm - Website Information
- Email - Gunnedah Solar Farm - Post Approval Document Received - (SSD-8658-PA-11)
- Email - RE_ Gunnedah Solar - Construction Certificates & Design Deliverables Priority
- Email - Gunnedah_ Construction Certificates - Registered Engineer in Australia
- Email - Landscaping Plan - DPIE Approval
- Email - non Compliance email
- Email - Notice of Commencement email
- Email - Ongoing Council Correspondence-Consultation
- Email - Corres with GSC Road Upgrades

4.1.15 APPROVAL DOCUMENTS/LETTER

- Gunnedah Solar Farm - Post Approval Document Received - (SSD-8658-PA-9)
- Post Approval Form_20201001051952
- Water Management Plan (Phase 1) – Approval
- Water Management Plan (Phase 2) – Approval
- Environmental Management Strategy – Approval
- Approval of Plan Strategy or Study_24042020_044349

- Approval of Plan Strategy or Study_24042020_044349
- 47206-CI-Design Compliance Statement_201118
- 30032550_Structural Certification Gunnedah SF
- PCL Contractors Licence NSW
- Traffic Management Plan – Approval letter

4.1.16 OTHER

- 201211_Pacific Rim Pty Ltd Policy Statement - Environmental 2021
- Covid 19 - Construction Work Days Order – extension
- Covid 19 Development Construction Work Days Order 2020
- Grass Species List
- Letter – Gunnedah Solar Farm (SSD-8658) Independent Environmental Audit – request for additional information (6/7/2021)

4.2 COMPLIANCE PERFORMANCE

The audit determined that Gunnedah Solar Farm has generally implemented the project specific environmental controls within the construction and management activities being undertaken. The comparison of audit findings and compliance ratings is as follows:

SSD Requirements	Findings
Conditions of Consent	Compliant - 46
	Non-compliant - 2
	Not Triggered - 8
Post Approval Requirements	Compliant - 14
	Non-compliant - 0
	Not Triggered - 4
Environmental Impact Statement	Compliant - 52
	Non-compliant – 1 (addressed and recorded along with COC NC)
	Not Triggered - 0

Table 4 comparison of audit findings and compliance ratings

4.3 SUMMARY OF AGENCY NOTICES, ORDERS, PENALTY NOTICES OR PROSECUTIONS

Gunnedah Solar Farm noted that no agency notices, orders, penalty notices or prosecutions have been issued. One reportable environmental incident occurred which was investigated by DPIE and resulted in a warning letter being issued to Canadian Solar on 12th February 2021. The incident was a non-compliance with the Traffic Management Plan and the approved site access routes by a heavy vehicle.

4.4 NON-COMPLIANCES

There were three non-compliances recorded as part of this audit, however the audit report has recorded this as two non-conformances due to the inter-related nature of the EIS non-conformance with a COC non-conformance, explained further in Section 5.1.

The third non-compliance relates to two heavy vehicles that were recorded crossing Cohens Bridge over the Namoi River, which is not an approved access route for heavy vehicles. According to the information obtained through the site interview process, DPIE attended site to investigate the non-compliance after it was self-reported. The corrective actions put in place included Gunnedah Solar Farm hiring a security guard to monitor the bridge and take photographs of the number plates of all heavy vehicles. These number plates were then cross referenced to site related vehicles. This non-compliance resulted in a warning letter being issued by DPIE to Canadian Solar on 12th February 2021.

4.5 PREVIOUS AUDIT RECOMMENDATIONS

This is the first independent audit conducted and as such there are no previous audit recommendations which needed to be assessed for close out.

4.6 EMP, SUB-PLANS AND COMPLIANCE DOCUMENTS

The management plans were reviewed and considered generally adequate and having identified suitable controls for managing environmental impacts of the project.

4.7 ENVIRONMENTAL PERFORMANCE

This is the first independent site audit conducted on this project. Therefore, there were no action items from previous audits to assess.

Overall environmental performance was assessed and where poor or an area for improvement identified, a non-compliance or recommendation was given and an action was raised. Non-compliances and action items are discussed in section 5.

4.8 COMPLAINTS

A Complaints Register is available where information regarding complaints was recorded, including the relevant resolution. The register is available on the website. A summary of the complaints is below.

Gunnedah Solar Farm Complaints Register									
Ref No.	Date Received	Complainant Name	Address	Contact Phone	Description of Complaint	Investigator Name	Date Closed Out	Comments	
GSF-01	17-Sep-20	Georgina Carrigan	c/- 765 Orange Grove Road, Orange Grove	428668589	Forced of road by heavy vehicle	Cannington	18-Sep-20		
GSF-02	27-Jan-21	Unknown (reported via a 3rd party)	Unknown	Unknown	Heavy vehicle deliveries not using designated heavy vehicle route. Using Cohens Bridge in Gunnedah town.	Cannington		Validity of complaint confirmed by Paul Cannington who spoke with the truck drivers and confirmed they had taken this route.	

Table 5 Summary of the complaints as per Complaints Register

4.9 INCIDENTS

One incident has been recorded for the project which is described in section 4.4.

4.10 ACTUAL VERSUS PREDICTED ENVIRONMENTAL IMPACTS

There are no significant change or additional impacts noted for the construction phase of the Gunnedah Solar Farm project, that were not identified in the EIS, based on the document audit and site inspection.

While two heavy vehicle complaints have been received, only one was attributed to the GSF project after an investigation. DPIE was notified within the required timeframe and corrective actions put in place. Whilst this incident relates to approved access routes it did not result in any harm that could be deemed material harm to the environment.

4.11 SITE INSPECTION

The site inspection was conducted on 30th March 2021. The Moss Environmental auditor, and PCL HES Supervisor drove and walked over the site, observing site activities and compliance with environmental control and mitigation measures. The environmental controls observed included:

- Stabilisation of site access roads;
- Regular use of two water carts for dust suppression, with no dust pollution observed;
- Monitored and sign-posted site speed limit;
- Visual amenity for the closest sensitive receiver has been minimally impacted;
- Drop down fencing for flood protection is in place;
- Waste separation is being done very well;
- Mud and debris is being effectively managed from being tracked out onto public roads through the use of an oversized cattle grid;
- Site boundaries are well flagged;
- Progressive site stabilization is being done, however the strike rate is very poor, and further rehabilitation is needed;

One issue was raised during the site inspection, which resulted in an action item being recorded:

Issue

Minimal chemical usage on site. Storage of fuels and oils was observed during the audit and noted as adequate. However, handstand and bunding at refueling pods is recommended.

Action item

Provide more extensive training to staff and sub-contractors who are conducting environmental site inspections.

PCL currently uses a risk identification type of site assessment. Inspectors need to be competent in identifying the risks.

Please refer to photos of the site inspection in **Appendix G**.

4.12 KEY STRENGTHS

Overall, the project environmental performance is in compliance with Development Conditions of Consent SSD 8658, and Post-approval requirements and met with the following key strengths noted;



- Internal and external community consultation is regular and well delivered;
- Complaints have been recorded and responded to appropriately;
- Traffic of both heavy and light vehicles is well managed, documented and rules adequately policed;
- Dust is managed well via a regular timetable of rounds by the water carts on an on-call basis;
- Waste segregation is in place, communicated well to site staff;
- Landscape plantings are on-track and remnant vegetation barriers have been implemented and
- Documentation is well managed, up to date and complete.

5 RECOMMENDATIONS

Three recommendations have been raised because of this audit. These recommendations are based on the reviewed project documentation and site inspection.

Recommendations
1. Provide more extensive training to staff and sub-contractors who are conducting environmental site inspections. PCL currently uses a risk identification type of site assessment. Inspectors need to be competent in identifying risks.
2. Additional progressive rehabilitation is required due to poor strike rate.
3. Include the locations of spill kits on Environmental Control Plans

Table 6 Recommendations

5.1 NON-COMPLIANCES

One minor non compliance was raised as a result of this audit. This non-compliance relates to Schedule 2, Condition 2/ Terms of consent from the Development Consent Conditions. This condition is very broad;

The Applicant must carry out the development:

- (a) Generally in accordance with the EIS; and
- (b) (b) in accordance with the conditions of this consent.

There are 52 components to this audit item, with only one item being considered a non-compliance. The project is non-compliant with Condition of consent 2(a) in relation to the EIS mitigation measures G2 and W3. Whilst it could be argued that the condition is met due to the wording 'generally', the auditor notes that environmental education of site staff and sub-contractors is paramount to good environmental practice.

One other non-compliance was raised as a result of this audit. This non-compliance relates to Schedule 3, Condition 3 / Designated Over-Dimensional and Heavy Vehicle Access Route.

This condition requires that;

All over-dimensional and heavy vehicles associated with the development must travel to and from the site via Kamilaroi Highway, Blue Vale Road, Old Blue Vale Road, Kelvin Road, Orange Grove Road and the approved site access point, as identified in the figure in Appendix 3 of the conditions of consent.

On the 27th January 2021, Canadian Solar were non-compliant with this condition of the consent when it was reported to DPIE that two trucks used an unapproved access route to access the project site. DPIE attended the site to conduct an investigate the non-compliance after it was self-reported. A warning letter was issued by DPIE to Canadian Solar on 12th February 2021. The corrective actions put in place included Gunnedah Solar Farm hiring a security guard to

monitor the bridge and take photographs of the number plates of all heavy vehicles. These number plates were then cross referenced to site related vehicles.

5.2 ACTION ITEMS

The audit resulted in:

- 2 non-compliance;
- 2 action items to be assessed during the next audit.

The following action item must be addressed and closed out during the next Independent Audit.

Action Item
1. Prepare and deliver toolbox talks/environmental induction covering all environmental issues from the EIS mitigation measures G2, to all site staff and sub-contractors.
2. Require all trucking companies to be re-toolboxed on the approved access routes and conduct regular 1-day and ad-hoc spot audits on trucks coming to site by monitoring the unapproved access route for any breaches.

Table 7 Action Item

5.3 OPPORTUNITIES FOR IMPROVEMENT

Based on the findings from the site inspection, there are improvement opportunities in the following area:

- Staff and sub-contractor training in environmental related issues, including toolbox talks, environmental inductions for staff and contractors inducted under the former site induction presentation; and
- Additional progressive rehabilitation is required due to poor strike rate.
- Training and monitoring of trucking companies regarding the approved access routes to site.

6 CONCLUSION

Gunnedah Solar Farm achieved a score of 96.43% compliance for the Conditions of Consent in the Moss Environmental auditing system which is based on the *Independent Audit Post Approval Requirements (2018)* and the *Moss Environmental Standard Operating Procedure-Independent Auditing for State Significant Projects*.

The audit resulted in:

- 2 non-compliance;
- 2 actions item to be assessed during the next audit.



7 APPENDIX

7.1 APPENDIX A – INDEPENDENT AUDIT TABLE

Independent Audit - Post Approval Requirements (PAR, 2020)

26 Mar 2021 / Shonelle Gleeson-Willey

Complete

Score	100%	Failed items	0	Actions	0
Conducted on	26 Mar 2021 14:45 AEDT				
Prepared by	Shonelle Gleeson-Willey				
Location	632 Kelvin Rd, Gunnedah NSW 2380, Australia (-30.9361332, 150.2814769)				

Inspection

100%

Question 1: PAR Section 2

100%

Identify which phase the project is currently proceeding with and outline whether or not the independent audit is currently being completed within the prescribed timeframes outlined in Table 1 below. If written extension to time frames has been received from the department attach correspondence as evidence.

100%

Eg: What is the construction/ operations/ closure start date recognized by the department and where does this fit in with the requirements prescribed in the audit frequency table?

Table 1 - Audit frequency

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.
Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.
Closure / Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.

The timeframes in Table 1 include completion of all activities required in undertaking an Independent Audit.

3

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

The project is within the construction phase. DPIE stated that construction started on 1st October 2020. The audit commenced on 29th March 2021.

Take a photograph of evidence (if applicable)

 [Audit reports_22012021_125750_.pdf](#)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

The independent audit has found that the Gunnedah Solar Farm is generally in compliance with the Conditions of Consent and Environmental Impact Statement mitigation measures.

Compliance Status

Compliant

Unique Identification compliance status number

Question 2: PAR Section 2

100%

Has the proponents response to previous Independent Audit Report findings been submitted no later than 2 months of the undertaking of the audits site inspection?

100%

Has the Independent Audit Report and the proponents response been submitted to the Department via the Major Projects Portal?

Eg: Refer to Table 1 in 'Question 1: PAR Section 2' if this applies or as otherwise specified in the conditions of consent. If this is a initial independent audit, make note in the recommendations if a submission of response has been scheduled by the proponent to submit within the 2 months or as specified otherwise.
Provide evidence or sight the submission via the Major Projects Portal

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Question 3: PAR Section 3.1

100%

Have the lead auditor and any technical specialists who may be supporting the audit team been agreed upon in writing by the Planning Secretary before the commissioning of the audit? Each member of the audit team must receive the Departments agreement and be endorsed by the Planning secretary. ie "This is not a one off approval"

100%

Eg: This should have already been confirmed before beginning the audit however ensure the agreement is confirmed by the Planning Secretary for all of the audit team.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Approval to conduct the Independent Audit granted by DPIE on 22/1/2021.

Take a photograph of evidence (if applicable)

 [Approval to conduct audit Audit reports_22012021_125750_.pdf](#)

 [Audit reports_22012021_125750_.pdf](#)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Question 4: PAR Section 3.2

100%

Scope Development

The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit.

100%

Eg: As the auditor has there been consultation? If the consulted parties (CCC for example) requests are not reasonable and are outside the scope than the auditor must provide justification of how they have considered the matters raised during consultation in the audit report.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Consultation undertaken with DPIE.

The Department requests that during the audit particular attention is given to the following:

Schedule 3 Condition 9 – implementation of the Traffic Management Plan;

Schedule 3 Condition 11 – implementation of the Landscape Management Plan; and

Schedule 3 Condition 16 – onsite air quality management

Take a photograph of evidence (if applicable)

 [FW_ Consultation requirements SSD 8658.pdf](#)

 [RE_ Consultation requirements SSD 8658.pdf](#)

 [Consultation Letter_Request DPIE 20210209.pdf](#)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Question 5: PAR Section 3.3, 1 A:

100%

Has the audit team assessed all of the conditions of consent applicable to the phase of the development that is being audited?

100%

Eg: Conditions of consent will vary for different projects and should be adjusted in the iAuditor Assessment Template. Ensure this template is completed in conjunction with this PAR 2020 template.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

SSD 8658 Conditions of Consent audit report

Take a photograph of evidence (if applicable)

 [On-site audit assessment.pdf](#)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Question 6: PAR Section 3.3, 1 B:

100%

Assess all post approval and compliance documents prepared to satisfy the conditions of consent:

100%

-Assess the Environmental Management Plans and Sub Plans and evaluate if the plans are effectively implemented for the project?

Eg: When was the EMP last reviewed and is it current? Are the objectives of the EMP being met? Are the Sub Plans being followed? How are the requirements of the documents being conveyed to staff?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

The following documents, email correspondence and plans were reviewed as part of the audit;

Report / Plans

Gunnedah Solar Farm, Environmental Impact Statement

Gunnedah Solar Farm, Construction Environmental Management Plan

Appendix A - Additional Consultation Evidence

Appendix B GSF Community Engagement Plan

Appendix GG GSF Bushfire Management Plan;

Appendix LL - GSF Mobile Plant Management Plan

Appendix JJ - GSF Traffic Management Plan

Appendix Y GSF Emergency Response Plan Rev 003

GSF Environmental Management Strategy

GSF-Procurement-Management-Plan-REV-000-2

GSF Landscape Management Plan

Water Management Plan (Phase 1)

Water Management Plan (Phase 2)

Aboriginal Heritage Assessment

Protocols/Policies/Registers

Gunnedah Chance Find Protocol FINAL

PCL Constructors Pacific Rim Pty Ltd - Complaints Procedure

Complaints Register 280221;

Induction register;

Environmental Checklist

Gunnedah - Project Roles and Responsibilities Matrix - 2020.11.20

Gunnedah HSE Roles and Responsibilities Rev 5 - 9 Dec 2020

HSE Advisory - Environmental Roles and Responsibilities

Gunnedah Solar Farm - Waste Management Tracking

Designs/Drawings

Civil - IFC Civil_Site Plan

Electrical Layout - dwg_727160_GUN_E200

Piling and Mechanical - Gunnedah Solar - 1P SAT Site Layout Option I (Rev.15A.1)

Civil Design - ST-CE-001
Electrical Design - EL-DC_003
01_20200910_3600727160_GunnSolar_PrelimDesign_WMP_FINAL_collated_red
01_20200920_3600727160_WMP_RespLetter2_DW_FINAL_collated
Gunnedah O&M Building Layouts
Fire water tank location
Presentations/Inductions
Induction – Short duration worker;
Induction HSE orientation checklist – Australia;
Gunnedah Solar Farm Delivery Driver Information Sheet;
Gunnedah Solar Farm Delivery Driver Project Safety Overview;
Gunnedah Solar Farm Visitor Project Safety Overview;
Civil Presentation - Lessons Learned
Gunnedah Solar Farm Project Environmental Overview
Community Notifications
Notice to Residents - Access Road Construction – Final
Notice to Residents – Gunnedah Solar
Newspaper Notice
Environmental Inspections
Inspection - Post Rain event
Inspection - Supervisor Action
Flood Modelling and Water Management
Constraints Map, 17 September 2018
Fence Configuration 5 Memo
SY20137 Report Review of Hydrology Rev00_Rev0
SY20137S001 Report Hydraulic Modelling Rep ID 20_Rev00
Water Levels at Fence Boundary
Mobile Plant
GSF Mobile Plant Register
GSF-PIL - Plant Prestarts 25.01-30.1
Piling Rig Acoustic Report
Stralis Pre-Start Inspections
Road Management and Dilapidation
Gunnedah Solar Farm Road Inspection Report-Orange Grove Road- 03-02-2021
PCL-GSF HV Route- Pavement Dilapidation Report (Rev 0)
Section 138
GSF PCL Constructors - Permit and Works Consent - Executed - Signed
Erosion and Sediment Control
Current Silt Fence Redline Drawings
dwg_3600727160_20210412_fence_C-500
Fencing Plan
Sediment and Fencing Design
Sediment Control Plans
Site Plot Plan
Constraints Map, 17 September 2018
Site Plot Plan Rev 2
Traffic Management
GSC Corres - Traffic Management Plan
GSF -PCL- Access Road Truck Movement Schedule 04-02-2021

Gunnedah Solar Farm Delivery Driver Information Sheet
 Gunnedah Solar Farm Delivery Driver Project Safety Overview
 NHVR - Oversize Dimension Permit No. 447540V2
 Emails
 Email – Gunnedah Solar Farm Emergency Preparedness;
 Email - Gunnedah Solar Farm - Post Approval Document Received - (SSD-8658-PA-11)
 Email - Gunnedah Solar Farm - Post Approval Document Received - (SSD-8658-PA-13)
 Email - RE Gunnedah Solar Farm - Website Information
 Email - Gunnedah Solar Farm - Post Approval Document Received - (SSD-8658-PA-11)
 Email - RE_ Gunnedah Solar - Construction Certificates & Design Deliverables Priority
 Email - Gunnedah_ Construction Certificates - Registered Engineer in Australia
 Email - Landscaping Plan - DPIE Approval
 Email - non Compliance email
 Email - Notice of Commencement email
 Email - Ongoing Council Correspondence-Consultation
 Email - Corres with GSC Road Upgrades
 Approval documents/Letter
 Gunnedah Solar Farm - Post Approval Document Received - (SSD-8658-PA-9)
 Post Approval Form_20201001051952
 Water Management Plan (Phase 1) – Approval
 Water Management Plan (Phase 2) – Approval
 Environmental Management Strategy – Approval
 Approval of Plan Strategy or Study_24042020_044349
 Approval of Plan Strategy or Study_24042020_044349
 47206-CI-Design Compliance Statement_201118
 30032550_Structural Certification Gunnedah SF
 PCL Contractors Licence NSW
 Traffic Management Plan – Approval letter
 Other
 201211_Pacific Rim Pty Ltd Policy Statement - Environmental 2021
 Covid 19 - Construction Work Days Order – extension
 Covid 19 Development Construction Work Days Order 2020
 Grass Species List

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Question 7: PAR Section 3.3, 1 C:

100%

What environmental licenses or approvals are in place for this project (Other than EPL's or POEO act approvals)?

100%

Eg: List all licenses in possession by the site and evaluate the conformity to such conditions. Are staff adequately aware of conditions and are mechanisms in place to ensure compliance with such licenses? Is there monitoring of control points to ensure compliance with license conditions?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

No other licences or approvals

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Question 8: PAR Section 3.3, 2 A:

100%

Review the environmental performance of the actual impacts compared to the predicted impacts documented in the Environmental Impact Assessment

100%

Eg: Using the Environmental Impact Assessment outline the key factors identified in the report and assess in comparison to current impacts. Have the contingency plans been effective in managing the predicted impacts? Have there been any predicted impacts in the EIA which are now noted in the incident register? Are there any impacts that were not predicted but have become an actual impact? How is the site managing these risks? Is there a eg: a risk register, contingency plan etc?

Make note of: General compliance of actual vs predicted impacts and any off site impacts of the development required under the Environmental Planning and Assessment Act 1979 for later use in audit report.


Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

The audit Assessment of Schdule 2 Condition 2, assessed project compliance against all the EIS mitigation measures.

Take a photograph of evidence (if applicable)

 [On-site audit assessment.pdf](#)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Generally in compliance.

Unique Identification compliance status number

Question 9: PAR Section 3.3, 2 B:

100%

Review the environmental performance against the physical extent of the development in comparison to the approved boundary

100%

Eg: Using maps and site plans assess the validity of the development within the boundaries. Are all assets within the boundary? Are vehicles being parked within the premises? Are compound sites, toilet blocks, buildings and designated access points being used as specified? If necessary make notes to guide your audit team during the site walk around.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Evidence - Project boundaries aerial photograph.

The site inspection assessed the site boundaries against the aerial photograph with depicted boundaries.

 [Civil - IFC Civil_Site Plan.pdf](#)

 [Gunnedah-Solar-Farm-EIS-download 36.pdf](#)

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Question 10: PAR Section 3.3, 2 C:

100%

Review the environmental performance against the physical extent of the development in comparison to the approved boundary

100%

Eg: Using maps and site plans assess the validity of the development within the boundaries. Are all assets within the boundary? Are vehicles being parked within the premises? Are compound sites, toilet blocks, buildings and designated access points being used as specified? If necessary make notes to guide your audit team during the site walk around.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Refer to audit of Conditions of consent

Compliance Status

Compliant

Unique Identification compliance status number

Question 11: PAR Section 3.3, 2 D:

100%

Review the environmental performance of the development having regard to agency and any particular environmental issues identified through consultation carried out when developing the scope of the audit

100%

Eg: Be sure to identify the 'agencies' involved in your answer. This may involve agencies that have been involved with consultation or may be in future. Eg: Namoi Water and flood plain management plan, state water, Natural Resource Access Regulator (NRAR) etc? Have there been any environmental issues raised by these agencies and how is the development responding to such concerns?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

DPIE was notified and subsequently involved due to a non-conformance with the conditions of consent. This NC related to 2 x trucks accessing site via an unapproved access. The NC was investigated by DPIE and corrective actions were put in place by Gunnedah Solar Farm. The NC was recorded as part of the audit of the conditions of consent.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Refer to the Conditions of Consent audit

Compliance Status

Compliant

Unique Identification compliance status number

Question 12: PAR Section 3.3, 2 E:

100%

Review the feedback received from the Department and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit

100%

Eg: How has the feedback from such departments been considered? Is there site meetings taking place with meeting minutes showing consideration of feedback from different stakeholders? Has reasonable feedback been actioned ? If not, what justification is there for why not?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Question 13: PAR Section 3.3, 3

100%

Review the environmental performance of the status and implementation of previous audit findings, recommendations and actions (if any)

100%

Eg: List all previous audits and completion dates. Are there any outstanding non-compliances? Are recommendations being considered? Were the corrective and preventative actions adequate? Are any of these non-conformances re-occurring in this audit? Are there action plans and or due dates scheduled to resolve the issues or mitigate the risks?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Question 14: PAR Section 3.3, 4

100%

Complete a high level assessment of whether Environmental Management Plans and Sub Plans are adequate

100%

Eg: 3.7.2 Document Evaluation: EMP and Sub Plans

1. they have been developed in accordance with the conditions of consent and approvals applicable to the development and their content is adequate; and

2. they have been implemented in accordance with the conditions of consent for the development.

The adequacy of documents must be determined on the basis of whether:

1. there are any non-compliances resulting from the implementation of the document; and

2. whether there are any opportunities for improvement.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Refer to the conditions of consent audit.

1 x non-conformance

1 x action item

Compliance Status

Compliant

Unique Identification compliance status number

Question 15: PAR Section 3.3, 5

100%

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

100%

Eg: What are the sites Key Performance Indicators (KPI's) and what are their environmental targets for site KPI's? Are there any regulators involved with the project? Has the site received any regulatory fines in the past? Is the site implementing industry best practice methods?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Refer to the Conditions of Consent Audit

Compliance Status

Compliant

Unique Identification compliance status number

Question 16: PAR Section 3.4

100%

Did this audit commence with an opening meeting and is a concluding meeting scheduled?

100%

Has a representative of the proponent from managerial level or above attended? Has the register of attendees been completed?

Eg: The Audit Attendee Register, Opening Agenda and closing agenda will cover this point in the PAR audit requirements. Ensure completion.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

 [GSF- Meeting attendee register.pdf](#)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Question 17: PAR Section 3.5

100%

The Independent Audit must include Site Interviews with key personnel involved in the project delivery.

100%

Eg: Ensure the Site Interviews are scheduled for the day and are completed before leaving site. See iAuditor interview template for completion. *This question acts more of a reminder for the audit team and should be marked as 'non compliant' until the interview has been completed. Note that interviews are generally not sufficient evidence to verify compliance with a condition consent.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Refer to Conditions fo consent audit for summary.

Take a photograph of evidence (if applicable)

 [Appendix C_staff interviews.pdf](#)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Question 18: PAR Section 3.6

100%

The Independent Audit must include a physical site inspection and must cover all development areas and environmental aspects that form part of the scope of audit.

100%

Eg: Ensure the Site Inspections are scheduled for the day and are completed before leaving site. See iAuditor inspection template for completion. *This question acts more of a reminder for the audit team and should be marked as 'non compliant' until the inspection has been completed.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

 [Appendix F_Site inspection and photos.pdf](#)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Supporting Documents

Table 1 - Audit frequency

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.
Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.
Closure / Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary.

The timeframes in Table 1 include completion of all activities required in undertaking an Independent Audit.

3

5. Glossary

Term	Definition
Approval	A regulatory approval instrument.
Authorised Reporting Officer	A person who is authorised by the proponent to submit formal reporting on the proponent's behalf
Conditions of consent	Means conditions imposed on either of the following: <ul style="list-style-type: none"> development consents for State significant development infrastructure approvals for State significant infrastructure transitional Part 3A project approvals other approvals or consents granted by the Minister in accordance with the <i>NSW Environmental Planning and Assessment Act 1979</i> .
Construction	As defined within the relevant consent/approval.
Development	Has the same meaning as in the conditions of consent.
Incident	As defined within the relevant consent/approval.
Minister	NSW Minister for Planning or delegate.
Predicted impacts	Predicted impacts described in the Environmental Impact Assessment documents that comprise the approved project.
Proponent	The person or entity that is referred as the proponent in an approval or the applicant in a consent or any other person carrying out any part of the development to which the approval or consent applies.
Planning Secretary	The Planning Secretary under the <i>Environmental Planning and Assessment Act 1979</i> or nominee.
State significant projects	Means any of the following: <ul style="list-style-type: none"> State significant development projects State significant infrastructure projects (including critical State significant infrastructure projects) transitional Part 3A projects Part 4 projects for which the Minister is the consent authority in accordance with the <i>Environmental Planning and Assessment Act 1979</i> .

Below Documents are Specific to the Gunnedah Solar Farm Independent Audit only

47 - Independent Post Approval Audit Documents

Password: bX5cUx8j

<https://pcl.egnyte.com/fl/YmnpQYIKQ2>

Summary of Items from PAR 2020 excluded from site audit:

The following Sections have been excluded from the site audit due to their irrelevance in the on site inspection. These sections instead outline the requirements for the writing of the Audit report itself and will be used post the site assessment.

- 1. Introduction
 - 3.7 Evaluation of compliance
 - 3.8 Compliance status descriptors
 - 4. Independent Audit Report
 - 5. Glossary
 - 6. Appendices
-

Appendix

-  [Audit reports_22012021_125750_.pdf](#)
-  [Approval to conduct audit Audit reports_22012021_125750_.pdf](#)
-  [Audit reports_22012021_125750_.pdf](#)
-  [FW_ Consultation requirements SSD 8658.pdf](#)
-  [RE_ Consultation requirements SSD 8658.pdf](#)
-  [Consultation Letter_Request DPIE 20210209.pdf](#)
-  [On-site audit assessment.pdf](#)
-  [On-site audit assessment.pdf](#)
-  [Civil - IFC Civil_Site Plan.pdf](#)
-  [Gunnedah-Solar-Farm-EIS-download 36.pdf](#)
-  [GSF- Meeting attendee register.pdf](#)
-  [Appendix C_staff interviews.pdf](#)
-  [Appendix F_Site inspection and photos.pdf](#)



Gunnedah Solar Farm SSD8658 Audit Assessment (Conditions of Consent)

27 Mar 2021 / Shonelle Gleeson-Willey

Complete

Score	96.43%	Failed items	2	Actions	17
Conducted on	27 Mar 2021 12:47 AEDT				
Prepared by	Shonelle Gleeson-Willey				
Location	659 Daruka Road Daruka NSW 2340 Australia (-31.040933950757438, 150.96909263063552)				

Failed Items & Actions

2 failed, 17 actions

Failed items

2 failed, 0 actions

Audit Assessment / Schedule 2, Condition 2 / Terms of consent

2. The Applicant must carry out the development:

(a) generally in accordance with the EIS; and

(b) in accordance with the conditions of this consent

Note: The general layout of the development is shown in Appendix 1

Compliance Status

Non-Compliant

Audit Assessment / Schedule 3, Condition 3 / Designated Over-Dimensional and Heavy Vehicle Access Route

3. All over-dimensional and heavy vehicles associated with the development must travel to and from the site via Kamilaroi Highway, Blue Vale Road, Old Blue Vale Road, Kelvin Road, Orange Grove Road and the approved site access point, as identified in the figure in Appendix 3.

Compliance Status

Non-Compliant

 [non Compliance email.pdf](#)

Other actions

17 actions

Audit Assessment / Schedule 2, Condition 1 / Obligation to minimise harm to the environment

In meeting the specific environmental performance criteria established under the consent, the applicant must implement all reasonable and feasible measures to prevent and/ or minimize any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.

Compliance Status

Compliant

Done | Priority Low | Due 5 Apr 2021 09:50 AEST | Created by Shonelle Gleeson-Willey

Update the staff and contractor site induction to include all items listed in the CEMP section 9.1.1

Audit Assessment / Schedule 2, Condition 2 / Terms of consent

2. The Applicant must carry out the development:

(a) generally in accordance with the EIS; and

(b) in accordance with the conditions of this consent

Note: The general layout of the development is shown in Appendix 1 / Independent audit findings and recommendations

Pre-audit assessment-EIS Mitigation Measures

Mitigation measures below have been sequentially numbered for this audit and reference the EIS mitigation measure number. The MM's listed below were not able to be assessed during this pre-audit assessment due to either a lack of documentation or requiring a site inspection. All MM's that start with 'Observe' relate to the site inspection. All MM's that start with 'request' are additional documents or records to be requested. All MM's that start with 'Discuss' require on-site discussion for clarification.

Request to be shown;

1. (G1) Request CEMP sub plans: Land management Plan inc weed management plan (received), soil and water

- management plan inc erosion and sediment control plans (received), waste management plan (CEMP section 11.10), traffic management plan (received), emergency contingency plan (received in Emergency Consult Folder).
2. (G2) Request Toolbox talks with env content that includes; env mitigation measures, vegetation clearing operations and controls to prevent unauthorised clearing, unexpected finds protocol, Aboriginal heritage, waste management strategies and mitigation measures. No change from site audit. Action item.
 3. (G3) Request Evidence of community consultation during construction (evidence provided for community engagement during EIS preparation -emails and community engagement presentations and numbers in attendance) (on-site audit evidence -notice to residents of early works-early works, full construction letter box drop and newspaper advertisement)
 4. (G5) Observe Evidence of mud and debris being removed from vehicles prior to leaving site. Observed cattle grid as rumble grid.
 5. (G5) Observe Evidence of mud and soil being removed from the local roadway (equipment used/log observed)
 6. (B1) Observe 10m vegetation buffer between perimeter of remnant vegetation stands (V1, V2 and V3) and works footprint. Observed
 7. (B4) Observe Evidence of trench backfilling ASAP and early morning trench inspections for fauna. Not applicable at this stage.
 8. (B5) Observe Speed limits of 20km/hr internal roads. Observed
 - 9.(B6) Request Procedures within the CEMP for caring for injured wildlife (not available during site audit). Updated prior to the end of audit to be included in the CEMP and provided as evidence.
 10. (L3) Observe Evidence of the landscape management plan implementation. Planning in place, no plantings have occurred but this CoC requirement is pre-operations.
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 12. (V1 & V3) Observe Evidence of visual screening in place and stabilised tracks but not bitumen or other dark coating. Observed light coloured gravel.
 13. (V4) Request and observe Evidence that all existing trees have been retained (trees have been fenced off outside the solar farm perimeter fence, but are within the Lot boundary)
 14. (V6) Observe Are areas being progressively stabilise with pasture grass?. Observed as being done but not achieving adequate strike rate.
 15. (N5) Discuss Do toolbox talks or the induction include that all plant should be shut down when not in use, and stored at farthest point from relevant assessment locations. (site audit- check the CoC for park-up requirements because having the park-up at the furthest point from the sensitive receivers would not be feasible or reducing greenhouse gas emissions for construction of the northern section)
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The designated routes of construction traffic to the site
 - A map of the primary access routes highlighting critical locations
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 - Scheduling of deliveries
 - Community consultation requirements
 - Any restrictions on traffic movements (such as residential areas, school pick-up and drop-off times)
 - Traffic controls (speed limits, signage, etc.)
 - A complaint handling procedure

- An induction process for vehicle operators.

All provided during

17. (T5) Observe the traffic control in accordance with the TMP. Observed
18. (T6) Request records of the letter sent to stakeholders advising of the traffic management controls. Paul lives on-site and informally liaises with the land owners and all local residents through community functions such as the rural fire brigade Christmas party and BBQs;
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26. (S4) Observe dust management measures. Observed
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31. (BF5) Observe/Request to see the two copies of the ERP stored at the main entrance point. non-compliant during site inspection but added before the end of the audit and now compliant.
32. (BF6) Observe a 15m wide APZ around the entire perimeter. Observed in site inspection.
33. (BF10) Observe a water supply tank with a capacity of 50,000L outside the APZ near the substation.
34. (A1) Discuss how dust is monitored. Discussed during site interviews.
35. (A3) Observe dust suppression or discuss how its done. Discussed and observed in site inspection and is adequate.
36. (Socio 2) Request to view the local resourcing plans. Site audit-viewed on-site Procurement Management Plan, Gunnedah Solar Project PCL Constructors Pacific Rim dated Sep 16th 2020.
37. Socio 4) Request to view continued engagement with Gunnedah Shire Council. Site audit, Email correspondence with GSC regarding changing CoC of approved hours. Email from Paul Carrington to Jack Morrissey Town Planner GSC dated 1st March 2021.
38. (W1) Observe waste management practices. Observed as adequate in site inspection.
39. (W3) Request to see the waste management section of the Env induction. site audit-already assessed as non-compliant.
40. (CU1) Discuss future or past updates to the CEMP for cumulative impacts from surrounding developments, particularly for the Waste and Traffic Management Plans. Site audit-no update for cumulative impacts assessed

but the only other large project is the Orange Grove Solar Project SSD 8882, however this project is on hold.

41. (EHP) Road Upgrades-Observe road upgrades of Old Blue Vale Road a min of 100m from its intersection with both Kelvin Road and Blue Vale Rd. Observed in site inspection.

42. (EHP) Observe upgrade to site access point off Orange Grove Road to allow for the largest vehicle accessing the site, including sealing the on-site access road a min of 30m from its intersection with Orange Grove Road. Observed in site inspection.

43. (EHP) Request the Traffic Management Plan. Site audit. recieved

45. (EHP) Request the Construction Certificates. On-site audit viewed and available in documents provided.

47. (EHP) Request the Landscaping Plan. Site audit, provided in documents provided.

48. (EHP) Request the Water Management Plan. site audit, provided in documents provided.

49. (EHP) Request all CEMP sub-plans from list (Land Management Plan, Soil and Water inc ErSed, Waste , Traffic, Emergency Contingency plan). Site audit, all provided.

50. (EHP) Request any Compliance reporting sent to the Department. site audit- yes a non-compliance of a heavy vehicle using the bridge which was self-reported to DPIE.

51. (EHP) Request Dilapidation surveys for Blue Vale Rd, Old Blue Vale Rd, Kelvin Rd and Orange Rd. site audit - provided and sighted on-site. Report by Constructive Solutions.

52. (statutory Approvals) Request the following; s.138 Permit, Class 1 Permit under Road Transport Act, s.68 Approval under Local Gov Act, s.99 Exemption under Rural Fires Act, s.45 Notice of Proposal, ch3. EPL under POEO Act, Construction Certificates under the Building Code of Aust, Oversized/over mass Permit under heavy vehicle national law. site audit-requested that all these be added to the document folder. not sighted during the audit.

Compliance:

1. (EHP) Commencement Notice evidence provided to the Department. Site Audit-Email advising pf lodgement from DPIE to Patricia Lee and Chelsea Milles on 1/10/2020 titles Gunnedah Solar Farm-Post Approval Document Recieved - (SSD-8658-PA-11).

Done | Priority Low | Due 5 Apr 2021 13:29 AEST | Created by Shonelle Gleeson-Willey

Provide all statutory licenses

Done | Priority Low | Due 5 Apr 2021 13:20 AEST | Created by Shonelle Gleeson-Willey

Upload civil design drawings-fencing that shows silt fencing installed on-site

Done | Priority Low | Due 5 Apr 2021 12:42 AEST | Created by Shonelle Gleeson-Willey

Prepare an unexpected finds protocol/procedure for soil contamination and waste.

Done | Priority Low | Due 5 Apr 2021 10:04 AEST | Created by Shonelle Gleeson-Willey

Update the CEMP to include a procedure for caring for injured wildlife

Done | Priority Low | Due 5 Apr 2021 13:24 AEST | Created by Shonelle Gleeson-Willey

Provide letter to DPIE regarding non-conformance self reporting.

Done | Priority Low | Due 5 Apr 2021 12:14 AEST | Created by Shonelle Gleeson-Willey

Provide the email from Gunnedah Shire Council stating that they are happy with the intersection upgrade.

To do | Priority Low | Due 5 Apr 2021 09:58 AEST | Created by Shonelle Gleeson-Willey

Prepare and deliver toolbox talk covering all environmental issues from EIS mitigation measures G2

Audit Assessment / Schedule 2, Condition 4 / The Applicant must comply with any requirement/s of the Secretary arising from the Departments Assessment of:

- (a) any strategies, plans or correspondence that are submitted in accordance with this consent.
- (b) any reports, reviews or audits commissioned by the department regarding compliance with this consent; and
- (c) the implementation of any actions or measures contained in these documents / Independent audit findings and recommendations

Approval letters from DPIE sighted. Compliance with the management plans will be determined during the post-audit assessment.

Done | Priority Low | Due 5 Apr 2021 13:45 AEST | Created by Shonelle Gleeson-Willey

Provide CEMP sign-off approval from DPIE

Audit Assessment / Schedule 2, Condition 13 / Subdivision

13. The Applicant may subdivide the site to create three new allotments, as identified in the figure in Appendix 5 and in accordance with the requirements of the EP&A Act and EP&A Regulation

Notes:

- Under Part 6 of the EP&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision
- Division 4 of Part 8 of the EP&A Regulation sets out the application requirements for subdivision / Evidence Collected

Provide Evidence here

Approval letter to be provided

Done | Priority Low | Due 5 Apr 2021 16:05 AEST | Created by Shonelle Gleeson-Willey

Subdivision approval letter to be provided.

Audit Assessment / Schedule 3, Condition 10 / Landscaping

Vegetation Buffer

10. The Applicant must establish and maintain a mature vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 to the satisfaction of the Secretary. This Vegetation buffer must:

- (a) Be planted prior to the commencement of operations;
- (b) Be wholly contained in Lot 2 of the site (see Appendix 5);
- (c) Consist of species that facilitate the best possible outcome in terms of screening the view of the solar panels and ancillary infrastructure on site from surrounding residences;
- (D) Be effective at screening views within 3 years of the commencement of construction; and
- (e) Be properly maintained with appropriate weed management / Evidence Collected

Provide Evidence here

Check Landscape Management Plan (make sure date listed above for plantings on-site is not correct)

Done | Priority Low | Due 5 Apr 2021 16:29 AEST | Created by Shonelle Gleeson-Willey

Moss Environmental to check on date listed in example for tree planting date.

Audit Assessment / Schedule 3, Condition 13 / Land Management

13. Following any construction or upgrading on the site, the Applicant must

- (a) Restore the ground cover of the site as soon as practicable;
- (b) Maintain the ground cover with appropriate perennial species;
- (c) Manage weeds within this ground cover / Evidence Collected

Provide Evidence here

Armidale Tree Group, Landscape Management Plan that includes consultation with GSC.

Done | Priority Low | Due 5 Apr 2021 16:34 AEST | Created by Shonelle Gleeson-Willey

provide grass lists for land management under the array, and documentation of other land management for weeds and soil.

Audit Assessment / Schedule 3, Condition 14 / Amenity

Construction, Upgrading and Decommissioning Hours

14. The Applicant may only undertake construction, upgrading or decommissioning activities on site between:

- (a) 7am to 6pm Monday to Friday
- (b) 8am to 1pm Saturdays and
- (c) At no time on Sundays and NSW Public Holidays

unless the Secretary agrees otherwise.

The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary:

- The delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or
- Emergency work to avoid the loss of life, property and/ or material harm to the environment. / Independent audit findings and recommendations

The CEMP noise and vibration table lists Saturday standard hours as 7am-4pm. This is a non-conformance with the CoC, unless approval for out of hours work has been sought.

However DPIE sent an email on 25th March (Heidi Watters) informing that "As you are aware, the Environmental Planning and Assessment (COVID-19 Development-Construction Work Days) Order 2020 allowed for construction work to occur on a Saturday, Sunday or public holiday, subject to conditions prescribed in clause 6 of the Order. This order has now been extended until 31st March 2022. New hours are Monday to Sunday 7am-6pm with no rock breaking, pile driving etc after 1pm on Sat or any time on a Sunday or public holiday.

The other noise measures listed in the CEMP are good.

Done | Priority Low | Due 6 Apr 2021 11:32 AEST | Created by Shonelle Gleeson-Willey

Update the CEMP to reflect correct approved hours.

Audit Assessment / Schedule 3, Condition 26 / Water Pollution

26. The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.

NOTE: Section 120 of the POEO Act makes it an offence to pollute any waters. / Independent audit findings and recommendations

The CEMP states, "Inspections and surveillance of construction and upgrading activities (including subcontractors) will be undertaken on a day-to-day basis. These inspections will not be documented unless significant non-conformances with the CEMP are identified."

Site audit: Viewed the site inspection register. Number of inspections carried out since the beginning of the project= 123 (but these are safety and environmental).

Done | Priority Low | Due 6 Apr 2021 15:06 AEST | Created by Shonelle Gleeson-Willey

PCL to update the environmental inspection system to include a checklist of things that need to be checked and required compliance state. PCL currently operates on a hazard identification system, which is not ideal because PCL is requiring sub-c to inspect

Done | Priority Low | Due 6 Apr 2021 15:04 AEST | Created by Shonelle Gleeson-Willey

PCL to provide number of environmental inspections carried out since the beginning of the project.

Audit Assessment / Schedule 3, Condition 29 / Fire Management and Emergency Response Plan

29. Prior to the commencement of operations, the Applicant must prepare a Fire Management and Emergency Response Plan for the development in consultation with the RFS and Fire & Rescue NSW. This plan must identify the fire risks and controls of the development, and the procedures that would be implemented if there is a fire on site or in the vicinity of the site. Two copies of the plan must be kept on site in a prominent position adjacent to the site entry point at all times. / Independent audit findings and recommendations

Site has determined this condition to be prior to operation. copies not at front gate.

Done | Priority Low | Due 6 Apr 2021 12:21 AEST | Created by Shonelle Gleeson-Willey

Put two copies of emergency plan at front gate.

Audit Assessment / Schedule 4, Condition 3 / Updating and Staging of Strategies, Plans or Programs

3. With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.

To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plan or programs to the Secretary for approval.

With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all parties referred to under the relevant conditions of this consent.

Notes:

-While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.

If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. / Independent audit findings and recommendations

PCL undertakes annual project audits by the QMC.

No specific quality control for document reviews was provided during the onsite audit.

Done | Priority Low | Due 6 Apr 2021 12:33 AEST | Created by Shonelle Gleeson-Willey

provide evidence of a system to ensure regular management plan reviews, for quality control

Audit Assessment

17 actions, 2 failed, 96.3%

Schedule 2, Condition 1

1 action, 100%

Obligation to minimise harm to the environment

In meeting the specific environmental performance criteria established under the consent, the applicant must implement all reasonable and feasible measures to prevent and/ or minimize any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.

1 action, 100%

Eg: Assess site training within staff/ contractor inductions, what is the environmental reporting procedure? Is there daily environmental inspections/ walk arounds etc?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

1. Completed induction as of 3rd 2021
312 completed inductions.
2. D09.OP.HS.05.203 Short duration worker HSE Orientation Checklist-Australia
This orientation checklist includes legislative environmental requirements, an overview of PCL policies and procedures, project site plan, regular hours of work, HSE signs and compliance, housekeeping, emergency response, incident reporting procedures.
- 3.D09.OP.HS.05.206 HSE Orientation checklist-Australia
This checklist is very similar to the one above but also includes Environmentally sensitive activities, mandatory attendance at field HSE meetings, introduced to a member of management who explained their commitment to HSE, corporate HSE video,
4. Gunnedah Solar Farm Project Safety overview
Includes Environmental requirements (photo evidence), incident reporting
5. EIS and mitigation measures (EIS Statements of commitment)
6. Gunnedah Solar Farm CEMP

Take a photograph of evidence (if applicable)

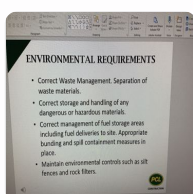


Photo 1



Photo 2

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Pre audit assessment

During the site audit request the following;

1. Environmental sections of the induction presentation covered in the checklists
2. TRA or similar that covers environmental Risks for specific tasks and the SHEWMS
3. Env incident reporting procedure and forms-the induction presentation doesn't give this info.
4. Demonstrate how PCL have marked the approved boundaries
5. Ask for the EIS statements of commitment (i only found mitigation measures)
6. Evidence of env hold point sign off
7. Environmental Control Plans
8. Toolbox talks and pre-start meeting notes with Env content
9. Who is the site SSEO manager as required in S 9.1.2 of the CEMP? The project personnel chart doesn't show 'environment' in any title
10. Evidence of any documented non-conformance with the CEMP from site inspections

Opportunities for improvement.

1. Update env component of induction. Section 9.1 of the CEMP lists the env requirements of the env induction. The induction provided from RFI didn't satisfy this list. Information as part of the findings summary report included all requirements except locations of the spill kits.

Recommendation - to include the location of all spill kits on a map of the site.

Audit: No change from pre-audit. All requested documentation provided and sighted.

Compliance Status

Compliant

Done | Priority Low | Due 5 Apr 2021 09:50 AEST | Created by Shonelle Gleeson-Willey

Update the staff and contractor site induction to include all items listed in the CEMP section 9.1.1

Unique Identification compliance status number

Schedule 2, Condition 2

7 actions, 1 failed, 0%

Terms of consent

2. The Applicant must carry out the development:

(a) generally in accordance with the EIS; and

(b) in accordance with the conditions of this consent

7 actions, 1 failed, 0%

Note: The general layout of the development is shown in Appendix 1

Eg: Assess how site policies make note of the EIS and how the conditions of consent make staff on site aware of the responsibilities?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Evidence

1. EIS

Mitigation measures include a list of required sub plans for the CEMP. However the subplans provided are not compliant with the full list.

2. Gunnedah Solar Farm Environmental Management Strategy

Table 2.1-Environmental Hold Points

3. Gunnedah Solar Farm-Post Approval Document Recieved-(SSD-8658-PA-11)

4. Appendix Y - Gunnedah Emergency Response Plan REV003.pdf

5. Appendix GG - GSF Bushfire Management Plan.pdf

6.Approval of WMP Phase 2 - 21092020.pdf

7.Water Management Plan (Phase 1).pdf

8.Water Management Plan (Phase 2).pdf

9. Dilapidation survey report by Constructive solutions dated April 2020 Gunnedah Solar Farm Heavy Vehicle Route-pavement dilapidation report.

10. Selection of site inspection sheets including corrective action tracking, viewed and uploaded to document folders.

11. Procurement Management Plan, Gunnedah Solar Project PCL Constructors Pacific Rim dated Sep 16th 2020.

12. PCL fencing plan (for sediment controls)-not able to be viewed during audit due to download speed.

Take a photograph of evidence

Independent audit findings and recommendations

7 actions

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Pre-audit assessment-EIS Mitigation Measures

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33. (BF10) Observe a water supply tank with a capacity of 50,000L outside the APZ near the substation.
34. (A1) Discuss how dust is monitored. Discussed during site interviews.
35. (A3) Observe dust suppression or discuss how its done. Discussed and observed in site inspection and is adequate.
36. (Socio 2) Request to view the local resourcing plans. Site audit-viewed on-site Procurement Management Plan, Gunnedah Solar Project PCL Constructors Pacific Rim dated Sep 16th 2020.
37. Socio 4) Request to view continued engagement with Gunnedah Shire Council. Site audit, Email correspondence with GSC regarding changing CoC of approved hours. Email from Paul Carrington to Jack Morrissey Town Planner GSC dated 1st March 2021.
38. (W1) Observe waste management practices. Observed as adequate in site inspection.
39. (W3) Request to see the waste management section of the Env induction. site audit-already assessed as non-compliant.
40. (CU1) Discuss future or past updates to the CEMP for cumulative impacts from surrounding developments, particularly for the Waste and Traffic Management Plans. Site audit-no update for cumulative impacts assessed but the only other large project is the Orange Grove Solar Project SSD 8882, however this project is on hold.
41. (EHP) Road Upgrades-Observe road upgrades of Old Blue Vale Road a min of 100m from its intersection with both Kelvin Road and Blue Vale Rd. Observed in site inspection.
42. (EHP) Observe upgrade to site access point off Orange Grove Road to allow for the largest vehicle accessing the site, including sealing the on-site access road a min of 30m from its intersection with Orange Grove Road. Observed in site inspection.
43. (EHP) Request the Traffic Management Plan. Site audit. received
45. (EHP) Request the Construction Certificates. On-site audit viewed and available in documents provided.
47. (EHP) Request the Landscaping Plan. Site audit, provided in documents provided.
48. (EHP) Request the Water Management Plan. site audit, provided in documents provided.
49. (EHP) Request all CEMP sub-plans from list (Land Management Plan, Soil and Water inc ErSed, Waste , Traffic, Emergency Contingency plan). Site audit, all provided.
50. (EHP) Request any Compliance reporting sent to the Department. site audit- yes a non-compliance of a heavy vehicle using the bridge which was self-reported to DPIE.

51. (EHP) Request Dilapidation surveys for Blue Vale Rd, Old Blue Vale Rd, Kelvin Rd and Orange Rd. site audit - provided and sighted on-site. Report by Constructive Solutions.

52. (statutory Approvals) Request the following; s.138 Permit, Class 1 Permit under Road Transport Act, s.68 Approval under Local Gov Act, s.99 Exemption under Rural Fires Act, s.45 Notice of Proposal, ch3. EPL under POEO Act, Construction Certificates under the Building Code of Aust, Oversized/over mass Permit under heavy vehicle national law. site audit-requested that all these be added to the document folder. not sighted during the audit.

Compliance:

1. (EHP) Commencement Notice evidence provided to the Department. Site Audit-Email advising pf lodgement from DPIE to Patricia Lee and Chelsea Milles on 1/10/2020 titles Gunnedah Solar Farm-Post Approval Document Recieved - (SSD-8658-PA-11).

Done		Priority Low		Due 5 Apr 2021 13:29 AEST		Created by Shonelle Gleeson-Willey
Provide all statutory licenses						
Done		Priority Low		Due 5 Apr 2021 13:20 AEST		Created by Shonelle Gleeson-Willey
Upload civil design drawings-fencing that shows silt fencing installed on-site						
Done		Priority Low		Due 5 Apr 2021 12:42 AEST		Created by Shonelle Gleeson-Willey
Prepare an unexpected finds protocol/procedure for soil contamination and waste.						
Done		Priority Low		Due 5 Apr 2021 10:04 AEST		Created by Shonelle Gleeson-Willey
Update the CEMP to include a procedure for caring for injured wildlife						
Done		Priority Low		Due 5 Apr 2021 13:24 AEST		Created by Shonelle Gleeson-Willey
Provide letter to DPIE regarding non-conformance self reporting.						
Done		Priority Low		Due 5 Apr 2021 12:14 AEST		Created by Shonelle Gleeson-Willey
Provide the email from Gunnedah Shire Council stating that they are happy with the intersection upgrade.						
To do		Priority Low		Due 5 Apr 2021 09:58 AEST		Created by Shonelle Gleeson-Willey
Prepare and deliver toolbox talk covering all environmental issues from EIS mitigation measures G2						

Compliance Status

Non-Compliant

Unique Identification compliance status number

Schedule 2, Condition 3

100%

3. If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.

100%

Eg: How are the EIS mitigation methods and conditions of consent communicated to staff. Is it referenced in the site environmental Policy (if One)? Has the Conditions of Consent prevailed over any inconsistencies?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

1. Request the Environmental policy.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Environmental Policy sighted during audit and saved into document folders.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 2, Condition 4

1 action, 100%

The Applicant must comply with any requirement/s of the Secretary arising from the Departments Assessment of:

(a) any strategies, plans or correspondence that are submitted in accordance with this consent.

1 action, 100%

(b) any reports, reviews or audits commissioned by the department regarding compliance with this consent; and

(c) the implementation of any actions or measures contained in these documents

Eg:

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

1. Approval letters from DPIE for submission of management plans. DPIE letter dated 17/4/2020 from DPIE to Chelsea Milles. Letters available for Landscape Management Plan, Traffic Management Plan, Chance Finds Protocol, Water Management Plan phase 1 and 2, Environment Management Strategy.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

1 action

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Approval letters from DPIE sighted. Compliance with the management plans will be determined during the post-audit assessment.

Done | Priority Low | Due 5 Apr 2021 13:45 AEST | Created by Shonelle Gleeson-Willey

Provide CEMP sign-off approval from DPIE

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 2, Condition 5

100%

Final Layout Plans

5. Prior to the commencement of construction, the applicant must submit detailed plans of the final lay out of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure.

100%

Eg: Is there email evidence of submission to the secretary? Has the details of solar panels and ancillary infrastructure been included? Record date of email etc. if so

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Civil-IFC Civil_Site Plan

Electrical Layout-dwg_727160_GUN_E200

Piling and Mechanical-Gunnedah Solar-1P SAT Site Layout Option 1 (Rev.15A.1)

Email: Gunnedah Solar Farm-Post Approval Document Received -(SSD-8658-PA-9)

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

This email confirms receipt of the revised Layout Plan by DPIE - dated 17/7/2020.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 2, Condition 6

100%

Upgrading of Solar Panels and Ancillary Infrastructure

6. Over time, the Applicant may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint of the site. Prior to carrying out any such upgrades, the applicant must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.

100%

Eg: Has there been any recent changes from the original development footprint? Have there been any revised layout plans / details submitted to the secretary if so?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Email: Gunnedah Solar Farm-Post Approval Document Received -(SSD-8658-PA-9)

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

This email confirms receipt of the revised Layout Plan by DPIE - dated 17/7/2020.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 2, Condition 7

100%

Work As Executed Plans

Prior to the commencement of operations, or following the upgrades of any solar panels or ancillary infrastructure, the applicant must submit work as executed plans of the development to the Department.

100%

Eg: Is there email evidence of this submission of work as executed? Check all solar panels and ancillary infrastructure on site that are completed have been submitted. Has there been a submission of the road upgrades to "Old blue Vale road" and "Kelvin Road" Yet? These being ancillary infrastructure and a requirement under Schedule 3, condition 4 were meant to be complete before commencement of construction. Note: Compare date of submission to the date of commencement (Commenced construction 1/10/2020))

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Schedule 2, Condition 8

100%

Notification of Department

Prior to the commencement of construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing of the date of commencement, or cessation, of the relevant phase.

100%

Eg: Has a notification been made in writing to the department notifying of the commencement of construction? Has it been submitted before 1/10/2020?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Solar Farm-Post Approval Document Received-(SSD-8658-PA-11). Schedule 2 Condition 8. Submitted by Mrs Chelsea Miles of Canadian Solar on 1/10/2020

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 2, Condition 9

100%

Structural Adequacy

The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia.

100%

Notes:

- Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works
- Part 8 of the EP&A Regulation sets out the requirements for the certification of the development

Eg: Is it within the Building Code of AUstralia guidelines? Is the Construction certificate & Occupation certificate available?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Stage 2 & 3 - Piles-Tracker-Mod Install, Fencing, & Civil
 LSL Receipt - Gunnedah SF - 20 October 2020.pdf
 460.4-2020 CC.pdf
 460.4-2020 CC Client Letter.pdf
 Stage 4 & 5 - Electrical, Trenching, & Foundations
 460.5-2020 CC Client Letter.pdf
 460.5-2020 CC.pdf
 PCU Works Undertaken Without CC Issue.pdf
 Receipt 2 - Instalment 9000823 - Gunnedah SF PL.pdf
 RE_ Gunnedah Solar Farm - Stage 5 CC (Ref_ 460_5-2020 CC).msg

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Certificates for Stages 2,3,4 and 5 are available and viewed.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 2, Condition 10

100%

Demolition

10. The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of structures, or its latest version.

100%

Eg: Has there been structures demolished on site? Is there any identified for demolition?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Schedule 2, Condition 11

100%

Protection of Public Infrastructure

11. Unless the Applicant and the applicable authority agree otherwise, the Applicant must:

(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development.

100%

(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.

This condition does not apply to the upgrade and maintenance of the road network, which is expressly provided in the conditions of consent.

Eg: Is there any other public infrastructure identified at risk? If so what are the plans for such items. Need to keep an eye out while on inspection too.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

PCL engineer did a review of the dilapidation survey on the road since the initial dilapidation survey. Document sighted Gunnedah Solar Farm PCL Pavement Inspection Report-Orange Grove Road prepared by Site Engineer (PCL) Chaitanya Mandali-ME-Civil, MEM.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Assessment states that the visual inspection was completed on 3/2/2021 with observations and defects listed as asphalt traveling very porous asphalt), edge cracking and minor road depressions. The conclusion is on overall observation in comparison to Constructive Solutions findings, the condition of existing road doesn't have many changes. Minor asphalt traveling issues has been noticed at various intervals causing road to be porous and extensive edge drops.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 2, Condition 12

100%

Operation of Plant and Equipment

12. The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:

100%

- (a) maintained in a proper and efficient condition; and**
- (b) operated in a proper and efficient manner**

Eg: Is there a Preventative Maintenance System in place? Is there Instruction manuals for staff to ensure equipment operated correctly?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Mobile Plant Management Plan, Gunnedah Solar Plant, 9110002. shows the requirement for daily pre-start on all machinery according to the log book requirements.
Pre-start audit for Australis the electrical contractor.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 2, Condition 13

1 action, 100%

Subdivision

13. The Applicant may subdivide the site to create three new allotments, as identified in the figure in Appendix 5 and in accordance with the requirements of the EP&A Act and EP&A Regulation

Notes:

1 action, 100%

- Under Part 6 of the EP&A Act, the Applicant is required to obtain a subdivision certificate for a plan of subdivision
- Division 4 of Part 8 of the EP&A Regulation sets out the application requirements for subdivision

Eg: Has there been any progress to subdivide the site? Is it in accordance with Appendix 5 of Conditions of consent?

Evidence Collected

1 action

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Approval letter to be provided

Done | Priority Low | Due 5 Apr 2021 16:05 AEST | Created by Shonelle Gleeson-Willey

Subdivision approval letter to be provided.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 1

100%

Transport

Over-Dimensional and Heavy Vehicle Restrictions

1. The Applicant must ensure that the:

(a) development does not generate more than:

-50 heavy vehicle movements a day during construction, upgrading or decommissioning;

-2 over dimensional vehicle movements during construction, upgrading or decommissioning

100%

-5 heavy vehicle movements a day during operations on the public road network

(b) Length of any vehicles (excluding over dimensional vehicles) used for the development does not exceed 26 meters, unless the secretary agrees otherwise?

Eg: How is the information above monitored? Is it effectively monitored? During site inspection check for vehicles that may be over 26m. Is there more then 50 heavy vehicle movements a day during construction?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Appendix JJ - GSF Traffic Management Plan.pdf

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

No vehicles over 26m long have come to site, road trains stop outside town and unhook and bring one trailer at a time.

The vehicle movements are planned, and approval is sought from the project team. We track on the GSF-Access Road Truck movements schedule 04-02-2021, which is tracked through dockets.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 2

100%

2. The Applicant must keep accurate records of the number of heavy vehicles entering or leaving the site each day.

100%

Eg: Is there a sign in/ sign out system for trucks entering/ leaving? Or a register?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

GSF-Access Road Truck movements schedule 04-02-2021, which is tracked through dockets. SS provided in folders.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 3

1 failed, 0%

Designated Over-Dimensional and Heavy Vehicle Access Route

3. All over-dimensional and heavy vehicles associated with the development must travel to and from the site via Kamlaroi Highway, Blue Vale Road, Old Blue Vale Road, Kelvin Road, Orange Grove Road and the approved site access point, as identified in the figure in Appendix 3.

1 failed, 0%

Eg: Has there been any registered complaints for the trucks on other unspecified roads? Is the approved site access being used? Take photo if yes.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Appendix JJ - GSF Traffic Management Plan.pdf, page 15.
Delivery driver induction and information sheet.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Consistent with Schedule 3 CoA 3 all over-dimensional and heavy vehicles associated with the development must travel to and from site via Kamilaroi Highway, Blue Vale Road, Old Blue Vale Road, Kelvin Road, Orange Groove Road and the approved site access point. As illustrated in 'Over-Dimensional and Heavy Vehicle Access Route Restrictions' presented in Appendix C of the Development Consent.

A copy of the 'Over-Dimensional and Heavy Vehicle Access Route Restrictions' is provided below (Figure 2). The section of the route from the Blue Vale Road turn off to the site is not approved for 26m B-Double routes by the NHVR. The route has been designed to avoid a right turn at the major intersection in the Gunnedah township.

Appropriate permits for use of the non-approved parts of the routes will be secured from the NHVR as required and the safety and condition of the roads will be further secured through the Dilapidation Survey and Traffic Control Plan process.

One non-compliance of a truck accessing site via an unauthorised route. This was self-reported to DPIE on 28th January 2021. The follow up email from Canadian Solar to DPIE and response from DPIE is attached.

Compliance Status

Non-Compliant

 [non Compliance email.pdf](#)

Unique Identification compliance status number

Schedule 3, Condition 4

100%

Road Upgrades

4. Prior to the commencement of construction the applicant must:

- (a) upgrade Old Blue Vale Road a minimum of 100m from its intersection with both Kelvin Road and Blue Vale Road to a standard that allows tow way heavy vehicle movements, in accordance with the Austroads Guide to Road Design (as amended by RMS supplements); and**
- (b) remove loose gravel material at the OldBlue Vale Road and Kelvin road intersection, to the satisfaction of the relevant road authority**

100%

Eg: Have the upgrades been completed before 1/10/2020. Is evidence provided? Has works been completed to the satisfaction of the relevant road authority?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Email from GSC stating that the improvements had been made and they were happy with the improvements. Email from Daniel Noble referenced earlier.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 5

100%

Cost Sharing - Road Upgrades

5. If the applicant of the Orange Grove Solar Project (SSD 8882) pays for the road upgrades required in conditions 4 of schedule 3 of this consent, and the Applicant proceeds with the construction of this development, then the Applicant must pay the applicant of the Orange Grove Solar Project half of the cost of the relevant road upgrades.

100%

If there is a dispute about the payment of these costs, then either party may refer the matter to the Secretary for resolution. The Secretary's decision on the matter must be final and binding on both parties.

Eg: Where is the other applicants project up to? Has consultation between both parties been effective? What was the end outcome?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Paul believes that GSC funded the road improvements from a government grant. Federal Government Building Our Future government grant. Email from Shane Melotte to Daniel Noble on Friday 6th December 2019. Dan confirmed no more work required on 9/12/2019

Compliance Status

Not Triggered

Unique Identification compliance status number

Schedule 3, Condition 6

100%

Site Access

6. Prior to the commencement of construction, the Applicant must upgrade the site access point off Orange Grove Road (shown in Appendix 1) with a rural Property type treatment to cater for the largest vehicle accessing the site, including sealing the on-site access road a minimum of 30 m from its intersection with Orange Grove road, in accordance with the Austroads Guide to Road Design (as amended by RMS supplements), to the satisfaction of Council.

100%

Eg: What is the largest vehicle to access site? Is the access appropriate under the guidelines? Is the on site access sealed up to 30 m from intersection?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Visual observation: driveway is sealed with a spray bitumen then sand colour gravel rolled ontop by Boral. then installed the rumble grid.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

effective in preventing glare.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 7

100%

Road Maintenance

7. The Applicant must:

(a) Undertake a dilapidation survey of the condition of the heavy vehicle transport route along Blue Vale Road, old Blue Vale Road, Kelvin Road and Orange Grove Road in accordance with any relevant Austroads standards or guidelines:

-Prior to commencement of construction, upgrading and/or decommissioning works;

-Within 1 month of the completion of construction, upgrading and or decommissioning works

(b) Rehabilitate or make good any damage to the road that could endanger road safety prior to the commencement of upgrading and/or decommissioning works; and

(c) Rehabilitate and or make good any development related damage to these roads:

- Identified during the carrying out of construction, upgrading and/or decommissioning works (if this damage could endanger road safety) as soon as possible after the damage is identified, but within 7 days at the latest; and

- Identified during any dilapidation survey carried out following the completion of construction, upgrading and/or decommissioning works within 2 months of the completion of the survey, unless the relevant road authority agrees otherwise, to the satisfaction of the relevant road authority.

If the construction, upgrading and or decommissioning of the development is to be staged, the obligations in this condition apply to each stage of the construction, upgrading and or decommissioning.

If there is a dispute about the scope of any remedial works or the implementation of these work, then either party may refer the matter to the secretary for resolution.

100%

Eg: Has the dilapidation survey been completed? Has the survey assessed Blue Vale Road, OldBlue Vale road, Kelvin Road and Orange Grove Road? Has there been any relevant Austroads standards or guidelines identified ? Were any of the works identified in the dilapidation survey completed within the 2 month time frame or unless agreed otherwise?

Has there been any damage caused to the road since beginning of construction? How is this monitored? Has there been any rectifications to date on the roads? If so was the damage rectified within 7 days?

Evidence Collected-

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Dilap survey by Constructive Solutions noted previously and dilap survey by PCL site engineer noted previously.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 8

100%

Operating Conditions

8. The Applicant must ensure:

- (a) The internal roads are constructed as all weather roads;
- (b) There is sufficient parking on site for all vehicles, and no parking occurs on the public road network in the vicinity of the site
- (c) The capacity of the existing roadside drainage network is not reduced;
- (d) all vehicles are loaded and unloaded on site, and enter and leave site in a forward direction; and
- (e) development - related vehicles leaving the site are in a clean condition and do not result in dirt being tracked onto the public road network.

100%

Eg: Are the internal roads on site 'all weather roads'? Are any vehicles parked on public roads? Roadside drainage network not effected? Vehicles are loaded/ unloaded on site and exit in a forward direction. No dirt matter being tracked onto public roads?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Discussion: road that have been finished being constructed are all weather. Built up with sub-grade, DGS 40 on-top.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

During the site visit I observed built up roads, constructed with a sub-grade and overlay of DGB.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 9

100%

Yes

Traffic Management Plan

9. Prior to the commencement of construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with RMS and Council, and to the satisfaction of the Secretary. This plan must include:

(a) Details of the transport route/s to be used for all development-related traffic, including the location of access points;

(b) Details of the measures that would be implemented to minimize traffic safety issues and disruption to local users of the transport route/s during construction, upgrading and/or decommissioning works, including:

- The movement of vehicles on the local road network within the site
- Temporary traffic controls, including detours and signage;
- Notifying the local community about project related traffic impacts;
- Procedures for receiving and addressing complaints from the community about development related traffic;
- Minimizing potential for conflict with school buses and other motorists as far as practicable;

100%

-Scheduling of haulage vehicle movements to minimize convoy length or platoons;

-Responding to local climate conditions that may affect road safety such as fog, dust, wet weather;

Responding to any emergency repair or maintenance requirements;
a traffic management system for managing over-dimensional vehicles;
and

(c) A drivers code of conduct that addresses

- Travelling speeds;
- Driver fatigue;

Procedures to ensure that drivers implement safe driving practices

(d) A program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; and

(e) A flood response plan detailing procedures and options for safe access to and from the site in the event of flooding

Eg: -Has the secretary demonstrated his/her satisfaction of the Traffic Management Plan (TMP)?

- Are the designated routes outlined in the TMP?
- What measures are in place to minimize traffic safety issues and disruption to local users during construction phase?
- Are there any temporary traffic controls eg: detours and signage in use?
- What is the procedure for receiving and addressing complaints from the community about development related traffic? Which staff are trained in the procedure and is it effective? (Possibly call the complaints number to test effectiveness)
- What measures are in place to minimize the effect on local school busses?
- Are haulage vehicles being scheduled to minimize convoy lengths?
- Is there any monitoring of climate conditions or response methods to emergency repairs or climate conditions such as rain, fog dust. Is it effective?
- Does the TMP have a system for managing over-dimensional vehicles
- Is there a driver code of conduct in place? Are staff/ contractors signed off on the code of conduct? Check training register and the training procedure for this code of conduct and the TMP.
- Is there a flood response plan and what are the procedures for safe access to and from site in the event of flooding? Who is trained etc. Check Training Register.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Approval of Plan Strategy or Study_24042020_044349.pdf (DPIE approval of the TMP)
 Site Specific Delivery Driver Project Safety Induction
 Delivery Driver Information Sheet

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 10

1 action, 100%

Landscaping

Vegetation Buffer

10. The Applicant must establish and maintain a mature vegetation buffer (landscape screening) at the locations outlined in the figure in Appendix 1 to the satisfaction of the Secretary. This Vegetation buffer must:

- (a) Be planted prior to the commencement of operations;
- (b) Be wholly contained in Lot 2 of the site (see Appendix 5);
- (c) Consist of species that facilitate the best possible outcome in terms of screening the view of the solar panels and ancillary infrastructure on site from surrounding residences;
- (D) Be effective at screening views within 3 years of the commencement of construction; and
- (e) Be properly maintained with appropriate weed management

1 action, 100%

Eg: Have the trees been planted before the 1/10/2020? Confirm area planted. Confirm the species of trees selected are appropriate for screening. Is the buffer likely to be effective at screening views within 3 years time? Is the buffer maintained with proper weed management practices?

Evidence Collected

1 action

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Check Landscape Management Plan (make sure date listed above for plantings on-site is not correct)

Done | Priority Low | Due 5 Apr 2021 16:29 AEST | Created by Shonelle Gleeson-Willey

Moss Environmental to check on date listed in example for tree planting date.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Seedlings are established by Armidale Tree Nursery in their Nursery and will be planted prior to operation.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 11

100%

Landscaping Plan

11. Prior to the commencement of construction, the Applicant must prepare a detailed landscaping Plan for the development in consultation with Council and to the satisfaction of the Secretary. This plan must include:

- (a) A description of measures that would be implemented to ensure that the vegetation buffer achieves the objectives of condition 10 (a)-(e) above;
- (b) include a program to monitor and report on the effectiveness of these measures, including if additional locations for further landscape screening are required to achieve the objective of Condition 10 (c) and (d)
- (c) Include details of who would be responsible for monitoring, reviewing and implementing the Plan; Timeframes for completion of actions.

100%

Following the Secretary's approval, the Applicant must implement the Landscaping Plan.

Eg: Was the Landscaping Plan prepared prior to 1/10/2020? Is there evidence of consultation with Council? Has satisfaction from the Secretary been demonstrated? Are items A,b & C of this condition being met? Are the timeframes identified under (c) appropriate and are they being met?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

GSF Landscape Management Plan.pdf
 Approval of Plan Strategy or Study_27042020_084509.pdf
 Landscaping Plan - DPIE Approval.msg
 Site interviews

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 12

100%

Extension of Vegetation Buffer

12. Within 3 years of the commencement of operations, the owner of residence VP1 may request the Applicant to extend the vegetation buffer on Lot 2 of the site (see condition 10 above and Appendix 5) to minimize the visual impacts of the development

Within 3 months of receiving such a request in writing from the owner, the Applicant must:

(a) Update the approved Landscaping Plan for the development in consultation with the owner;

(b) Ensure the updated plan:

-Clearly identifies the extended vegetation buffer;

100%

-Describes the measures that would be implemented to ensure the extended vegetation buffer meets the objectives in condition 10 (b), (c) and (e);

-Includes a program for the implementation of the extended vegetation buffer; and

(c) Submit the updated plan to the Secretary for approval

Following the Secretary's approval, the Applicant must implement the updated Landscaping Plan.

Note: To identify the location of residence VP1, see the figure in Appendix 1

Eg: Whilst this may not be triggered as yet, has the site demonstrated good environmental management planning practices for this condition in the future? Is there a matrix that flags up coming conditions or an aspects and impacts register? If not, this may be a suitable OPFI

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Schedule 3, Condition 13

1 action, 100%

Land Management

13. Following any construction or upgrading on the site, the Applicant must

(a) Restore the ground cover of the site as soon as practicable;

1 action, 100%

(b) Maintain the ground cover with appropriate perennial species;

(c) Manage weeds within this ground cover

Eg: Assess what measures/ procedures are in place for effective Land Management

Evidence Collected

1 action

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Armidale Tree Group, Landscape Management Plan that includes consultation with GSC.

Done | Priority Low | Due 5 Apr 2021 16:34 AEST | Created by Shonelle Gleeson-Willey

provide grass lists for land management under the array, and documentation of other land management for weeds and soil.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 14

1 action, 100%

Amenity

Construction, Upgrading and Decommissioning Hours

14. The Applicant may only undertake construction, upgrading or decommissioning activities on site between:

- (a) 7am to 6pm Monday to Friday**
- (b) 8am to 1pm Saturdays and**
- (c) At no time on Sundays and NSW Public Holidays**

unless the Secretary agrees otherwise.

1 action, 100%

The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary:

- The delivery of materials as requested by the NSW Police Force or other authorities for safety reasons; or**
- Emergency work to avoid the loss of life, property and/ or material harm to the environment.**

Eg: Are the designated times being followed? Are there any incidents in the register that breach outside of these timeframes? Check the sign in and sign out sheet for cross comparison of employees/ contractors working within these specified times.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Solar Farm CEMP, Section 11.2 Noise & Vibration

Staff Interviews

Email from Heidi Watters "Re: Gunnedah Solar Farm-Construction Work Days Extension"

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

1 action

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

The CEMP noise and vibration table lists Saturday standard hours as 7am-4pm. This is a non-conformance with the CoC, unless approval for out of hours work has been sought.

However DPIE sent an email on 25th March (Heidi Watters) informing that "As you are aware, the Environmental Planning and Assessment (COVID-19 Development-Construction Work Days) Order 2020 allowed for construction work to occur on a Saturday, Sunday or public holiday, subject to conditions prescribed in clause 6 of the Order.

This order has now been extended until 31st March 2022. New hours are Monday to Sunday 7am-6pm with no rock breaking, pile driving etc after 1pm on Sat or any time on a Sunday or public holiday.

The other noise measures listed in the CEMP are good.

Done | Priority Low | Due 6 Apr 2021 11:32 AEST | Created by Shonelle Gleeson-Willey

Update the CEMP to reflect correct approved hours.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 15

100%

Noise

15. The Applicant must minimize the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the 'Interim Construction Noise Guideline' (DECC, 2009) or its latest version.

100%

Eg: Does the site EMP consider noise mitigation under the standard?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Solar Farm CEMP, Section 11.2 Noise & Vibration

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 16

100%

Dust

16. The Applicant must minimize the dust generated by the development.

100%

Eg: What procedures are currently in place on site to monitor dust? Are there any complaints in the register relating to dust? Are there any measures in place minimizing dust?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Solar Farm CEMP, Section 11.1 Air Quality
 Water Management Plan (Phase 1) - Approval.pdf
 Water Management Plan (Phase 1).pdf
 Water Management Plan (Phase 2) - Approval.pdf
 Water Management Plan (Phase 2).pdf
 Approval of WMP Phase 1 - 12062020.pdf
 GSF Water Management Plan - DPIE Approved.pdf
 Approval of WMP Phase 2 - 21092020.pdf

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

The CEMP section 11.1 provides a small amount of detail relating to dust generation and mitigation measures. The CEMP refers the reader to the Soil and Water Quality Management Plan for the full list of mitigation measures. This sub-plan has been reviewed by NRAR and approved by DPIE.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 17

100%

Visual

17. The Applicant must:

- (a) Minimize the off-site visual impacts of the development, including the potential for any glare or reflection;
- (b) Ensure the visual appearance of ancillary infrastructure (including paint colors) blends in as far as possible surrounding landscape; and
- (c) Not mount any advertising signs or logos on site, except where this is required for identification or safety purposes

100%

Eg: Have Solar panels been installed yet? Are paint colors visually appropriate for infrastructure within the landscape surroundings? During site inspection, are there excessive advertising signs on site or logos on display other than safety or identification purposes?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Solar Farm CEMP, Section 11.8 Visual Impact
 Landscaping Plan - DPIE Approval.msg, email from Chelsea Milles 28/4/2020

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

CoA 11 of Schedule 3 requires the submission of a Landscaping Plan for approval prior to the commencement of works.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 18

100%

Lighting

18. The Applicant must:

(a) Minimize the off-site lighting impacts of the development;

(b) Ensure that all external lighting associated with the development:

- Is installed as low intensity lighting (except where required for safety or emergency purposes)

100%

-Does not shine above the horizontal

-Complies with Australian Standards AS4282 (INT) 1997 - Control of Obstructive Effects of Outdoor Lighting, or its latest version.

Eg: Note within evidence: how much lighting is currently in use and what are its main purposes? Are they installed to this conditions specifications?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take photos to show no light towers.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

No security lighting, no light towers. There should be no light emitted from the construction site at the moment. When the switch room and control rooms are installed they will have security lighting above the access door.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 19

100%

Heritage

19. Prior to the commencement of construction, the Applicant must undertake consultation with Aboriginal stakeholders, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.

100%

Eg: Has consultation taken place before the 1/10/2020? Has the Code of Practice been considered during consultation?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Chance Find Protocol FINAL.pdf
Aboriginal Heritage Assessment - Kelleher Nightingale Consulting Pty Ltd, March 2018

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

The Gunnedah Solar Farm Chance Finds Protocol was reviewed and no reference to consultation with local Aboriginal Groups found. This document makes reference to the Aboriginal Heritage Management Plan which was not provided in the RFI.

Request the Aboriginal Heritage M.P

Site Audit: Section 3 of the Aboriginal Heritage Assessment, Table 1. shows consultation with Karen Matthews from Red Chief Local Aboriginal Lands Council in the role of survey, and cultural heritage advisor.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 20

100%

Discovery of Human Remains

20. If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Applicant must notify the NSW Police and OEH as soon as possible following the discovery, and work must not recommence in the area until this is authorised by OEH

100%

Eg: Yes/ No?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Chance Find Protocol FINAL.pdf (Dec 2019, V.3)

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 21

100%

Chance Finds Protocol

21. Prior to the commencement of construction, the Applicant must prepare a Chance Finds Protocol for the development in consultation with the Aboriginal stakeholders, and to the satisfaction of OEH
Following OEH's approval, the Applicant must implement the Chance Finds Protocol

100%

Eg: Has the Chance Finds Protocol been completed before the 1/10/2020? Is the protocol completed to the satisfaction of the OEH and with Aboriginal stakeholders with evidence provided? Is the Approval successfully implemented? Are staff aware of this protocol?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Chance Find Protocol FINAL.pdf (Dec 2019, V.3)

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 22

100%

Soil & Water

Flood Management

22. Unless the Secretary agrees otherwise, the Applicant must:

(a) Design and construct the site perimeter security fencing with drop-down fencing at the locations outlined in the figure in Appendix 4; and

100%

(b) Ensure that the development operates in accordance with the:

- Draft Floodplain Management Plan for the Upper Namoi Floodplain 2016, or its latest version; and

-Carroll to Boggabri Floodplain Management Plan

Eg: Note your findings from site inspection for (a). Has the 2019 most current version for the DFMPUNF been considered? If reference to the 2016 version, has amendments been considered? Has the CBFMP also been taken into consideration? How are these measures from the Plans incorporated on site?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Water Management Plan (Phase 1) - Approval.pdf

Water Management Plan (Phase 1).pdf

Water Management Plan (Phase 2) - Approval.pdf

Water Management Plan (Phase 2).pdf

Fencing and drop-down fencing plan

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 23

100%

Operating Conditions

23. The Applicant must:

- (a) Minimize the sitting of solar panels and ancillary infrastructure within water courses in the approved development footprint;
- (b) Minimize any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Storm water: Soils and Construction Landcom, 2004) manual, or its latest Version;
- (c) Ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site,
- (d) Ensure all works (including watercourse crossings) are undertaken in accordance with the:
 - Guidelines for Controlled Activities on Waterfront Land (2012), or its latest; and
 - Why Do Fish Needs to Cross the Road? Fish Passage Requirements for Waterway Crossings (2004), or its latest version. Unless otherwise agreed by DoI-L&W

100%

Eg: Have solar Panel installation plans been minimized in high risk areas? Have sediment control measures been incorporated for the construction phase? Is there evidence of soil erosion on site? Is there monitoring taking place on site erosion? Have the respective guidelines been considered and or implemented?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Drawing List, Civil Drawings, Erosion and Sediment Control Plan 1 to 19. Issued for construction 90% November 2020, project number 3600727160

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Request site erosion and sediment control plans
Site audit: ErSed plans viewed and added to document folder.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 24

100%

Water Management Plan

24. Prior to the commencement of construction, the Applicant must prepare a Water Management Plan for the development in consultation with DOI - L&W, and to the satisfaction of the Secretary. This plan must include:

- (a) detailed baseline data on hydrology across the downstream drainage system in the Carrol to Boggabri Floodplain;
- (b) Detailed plans, including design objectives and performance criteria for the site perimeter security fencing;
- (c) a program to monitor and assess the impact of the development during flood events;
- (d) reporting procedures for the results of the monitoring program; and
- (e) A Plan to respond to any exceedances of the performance criteria and mitigate and/ or offset any adverse surface water impacts of the development.

100%

Following the Secretary's approval, the Applicant must implement the Water Management Plan

Eg: Has the Plan been prepared in consultation with DOI-L&W and to the satisfaction of the Secretary? Are all the required inclusions of this condition considered?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

revised Hydrology report
Water Management Plans
EIS Hydrology

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 25

100%

Water Supply

25. The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of the development to match its available water supply.

100%

Note: Under the Water Act 1912 and/ or the Water Management Act 2000, the Applicant is required to obtain the necessary water licenses for the development.

Eg: How is water usage monitored on site? How is water demand considered against availability? Are appropriate licenses obtained?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Solar Farm CEMP
Water Management Plan (Phase 1)

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

There were no records or discussion of water usage in these documents.
Site Audit: discussion the water usage is passed onto the civil contractor (Simmons) and they have a verbal agreement with the land owner that water for construction purposes can be used from his dams. Last year during dry period Simmons accessed town water supply through Council and trucked it to site. The site offices all use trucked in potable water, 2 x 20,000L tanks.
If there was a drought, the water isn't used for processing and vehicles are not washed. Construction water would still be the farm dams, or water from the 6 bores, or through the metered pump from the Namoi River.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 26

2 actions, 100%

Water Pollution

26. The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.

2 actions, 100%

NOTE: Section 120 of the POEO Act makes it an offence to pollute any waters.

Eg: What monitoring measures are in place to ensure water pollution does not occur? Is there regular inspections? Are preventative measures in place?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Solar Farm CEMP
SMC program - inspection and hazard identification records

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

2 actions

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

The CEMP states, "Inspections and surveillance of construction and upgrading activities (including subcontractors) will be undertaken on a day-to-day basis. These inspections will not be documented unless significant non-conformances with the CEMP are identified."

Site audit: Viewed the site inspection register. Number of inspections carried out since the beginning of the project= 123 (but these are safety and environmental).

Done | Priority Low | Due 6 Apr 2021 15:06 AEST | Created by Shonelle Gleeson-Willey

PCL to update the environmental inspection system to include a checklist of things that need to be checked and required compliance state. PCL currently operates on a hazard identification system, which is not ideal because PCL is requiring sub-c to inspec

Done | Priority Low | Due 6 Apr 2021 15:04 AEST | Created by Shonelle Gleeson-Willey

PCL to provide number of environmental inspections carried out since the beginning of the project.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 27

100%

Operating Conditions

27. The Applicant must:

(a) Minimize the fire risks of the development;

(b) Ensure that:

- There is defensible space of at least 10 meters around the perimeter of the solar array area that permits unobstructed vehicle access

- The Defensible space and solar array areas is managed as an Asset Protection Zone;

The development complies with relevant asset protection in requirements in the RFS's Planning for Bushfire Protection 2006 (or equivalent) and Standards for Asset Protection Zones

100%

-The Asset Protection Zone for the development is wholly contained in Lot 2 of the site (see Appendix 5)

-The development is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65mm Storz fitting located adjacent to the internal access road;

(C) Assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site ; and

(d) Notify the relevant local emergency management committee following the construction of the development, and prior to the commencement of operations

Eg: Is the 20,000L tank installed? Is the Asset Protection zone contained in Lot 2? Is site adequately prepared for fire response? (D) Not triggered.

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

APZ is in but 20,000L water tank is an operating condition.

Compliance Status

Not Triggered

Unique Identification compliance status number

Schedule 3, Condition 28

100%

Storage and Handling of Dangerous Goods

28. The Applicant must:

- (a) Store and handle all dangerous or hazardous materials on site in accordance with Australian Standard AS1940-2004: the Storage and handling of flammable and combustible liquids, or its latest version;
- (b) Ensure the substation is suitably bunded; and
- (c) Minimize any spills of dangerous goods and hazardous materials and clean up any spills as soon as possible after they occur.

100%

Eg: Are there any chemicals currently on site? Are they stored correctly ie: chemical suitability/ bund capacity. Are there MSDS's on site? Is substation bunded? Any spills evident or noted in incident reports? Is there Spill kits on site to clean up in the event of it occurring?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Contractor SDSs

Contractor hazardous substances registers

Contractor approvals for hazardous substances and Schedule 11 substances.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Request SDS's and observe chemical storage bunding. There are no entries in the incident register
 Site Audit: The the on-site fuel tanks and USTs doubled bunded, self contained that is used as a refueling station for heavy plant and vehicles - Diesel. No hard stand or bunded pad where refueling happens. Earthen bund not reinstated.

Spray paint, servicing truck for PCL and for external contractors (Pirtec), pesticide coated grain. All schedule 11 chemicals are approved by PCL before being brought onto site.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 29

1 action, 100%

Fire Management and Emergency Response Plan

29. Prior to the commencement of operations, the Applicant must prepare a Fire Management and Emergency Response Plan for the development in consultation with the RFS and Fire & Rescue NSW. This plan must identify the fire risks and controls of the development, and the procedures that would be implemented if there is a fire on site or in the vicinity of the site. Two copies of the plan must be kept on site in a prominent position adjacent to the site entry point at all times.

1 action, 100%

Eg: Has the Fire Management Plan been sighted? Is there two copies on site and one at the site entrance? Was the procedure developed in consultation with RFS & Fire & Rescue NSW? Has the site had any Mock drills to demonstrate competence?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Appendix Y - Gunnedah Emergency Response Plan REV003.pdf

Appendix GG - GSF Bushfire Management Plan.pdf

Emergency response drill 4/2/2021 focused on a fire in the crib room and communication between PCL and UGL on the substation site.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

1 action

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Site has determined this condition to be prior to operation. copies not at front gate.

Done | Priority Low | Due 6 Apr 2021 12:21 AEST | Created by Shonelle Gleeson-Willey

Put two copies of emergency plan at front gate.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 30

100%

Waste

30. The Applicant must:

- (a) Minimize the waste generated by the development in accordance with the EPA's waste hierarchy objectives of avoidance, resource recovery and disposal
- (b) Classify all waste generated on site in accordance with the EPA's Waste Classification Guidelines 2014 (or its latest Version)
- (c) Store and handle all waste on site in accordance with its classification
- (d) Not receive or dispose of any waste on site; and
- (e) Remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal

100%

Eg: Is there a waste register? Does the site utilize the EPA's waste hierarchy objectives of avoidance and is it classified via the classification guide? Is it stored appropriately? Who is the sites licensed waste contractor?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Gunnedah Solar Farm CEMP
Gunnedah Solar Farm - Waste Management Tracking.xlsx

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

The CEMP details the waste hierarchy and minimisation strategies.
The Waste Management Tracking Spreadsheet tracks all waste movements off-site including date, transport company, type, quantity and docket number.
Observe implementation in site inspection

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 3, Condition 31

100%

Decommissioning & Rehabilitation

31. Within 18 months of the cessation of operations, unless the Secretary agrees otherwise the Applicant must decommission the development and rehabilitate the site to the satisfaction of the Secretary. THis rehabilitation must comply with the objectives in Table 2.

100%

Eg: Not Triggered

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Schedule 3, Condition 32

100%

32. Within 3 years of commencement of operations, the Applicant must prepare a Decommissioning & Rehabilitation Plan for the development which shall be reviewed 2 years prior to the cessation of operations, to the satisfaction of the Secretary. This Plan must:

(a) Include detailed completion criteria for evaluating compliance with the rehabilitation objectives in Table 2 above;

(b) Describe the measures that would be implemented to:

-Decommission the development and rehabilitate the site in accordance with the rehabilitation objectives in Table 2 above and the associated completion criteria;

-Minimize the waste generated by the decommissioning of the development in accordance with the obligations in condition 30 above; and

(c) Include a program to monitor and report on the implementation of these measures against the detailed completion criteria

The Applicant must decommission and rehabilitate the site in accordance with the approved Decommissioning & Rehabilitation Plan.

100%

Eg: Has the D&RP been scheduled for 3 years time? If not, add as a to recommendations

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Not Triggered

Unique Identification compliance status number

Schedule 4, Condition 1

100%

Environmental Management

Environmental Management Strategy

1. Prior to the commencement of construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the 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) Describe the procedures that would be implemented to:

- Keep the local community and relevant agencies informed about the operation and environmental performance of the development;

100%

- Receive, handle respond to, and record complaints;

- Resolve any disputes that may arise;

- Respond to any non -compliance

- Respond to emergencies; and

(e) Include:

- References to any plans approved under the conditions of this consent;

and

- A clear plan depicting all the monitoring to be carried out in relation to the development

Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.

Eg: Was the EMP prepared before 1/10/2020? Is it to the satisfaction of the Secretary? Are (a) - (e) incorporated within the EMP?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Environmental Management Strategy approval was granted on 17/4/2020.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 4, Condition 2

100%

Revision of Strategies, Plans and Programs

2. The Applicant must:

(a) Update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and

(b) Review and if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the:

100%

- Submission of an incident report under Condition 4 of Schedule 4;
- Submission of an audit report under condition 7 of Schedule 4; or
- Any modification to the conditions of this consent.

Eg: Are the Strategies regularly reviewed or is there planned review in a calendar? Has there been a review triggered following any incident reports as well as submission to the secretary?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

PCL - Gunnedah Solar HSE plan Rev 5 , 27th August 2020, section 19.3 (states that following an incident, document reviews are triggered)

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 4, Condition 3

1 action, 100%

Updating and Staging of Strategies, Plans or Programs

3. With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.

To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plan or programs to the Secretary for approval.

With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all parties referred to under the relevant conditions of this consent.

1 action, 100%

Notes:

-While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.

If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.

Eg: Is there a scheduled review system in place? Does the site have a software in place that facilitates effective document review? If not, then a potential recommendation could be put forward to suggest a software eg: 'ELO'. As shown in the notes; are all the plans and or strategies targeting the construction phase of works? Is there a trigger in place for when to update plans / strategies to operation phase etc?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Site audit: Site specific HSE plan - Gunnedah Solar, August 27th 2020 Rev 5.
Quality Management Program D09.AA.QM.03.001, Rev. 1st Oct 2020

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

1 action

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

PCL undertakes annual project audits by the QMC.

No specific quality control for document reviews was provided during the onsite audit.

Done | Priority Low | Due 6 Apr 2021 12:33 AEST | Created by Shonelle Gleeson-Willey

provide evidence of a system to ensure regular management plan reviews, for quality control

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 4, Condition 4

100%

Incident Notification

4. The Department must be notified in writing to

compliance@planning.nsw.gov.au immediately after the Applicant

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.

100%

Eg: Is there a note of this in the incident report to trigger senior management to send to the Department? Has this been done in past incidents? If not, why not? Was the notification sent within a reasonably "immediate" time frame?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

no environmental incidents recorded to date

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 4, Condition 5

100%

Non - Compliance Notification

5. The Department must be notified in writing to compliance@planning.nsw.gov.au within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance.

100%

Eg: Action plan will be constructed at completion of audit

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Non-compliance email, from Patricia Lee (Canadian Solar) to James Epstein (DPIE), 28th Jan 2021.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Email notifying DPIE of non-conformance with schedule 3, Condition 3 (TMP, heavy vehicles using the heavy vehicle route) of SSD 8658. Non-conformance uploaded to the DPIE portal.

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 4, Condition 6

100%

Compliance Reporting

6. The Applicant must provide regular compliance reporting to the Department on the development in accordance with the Department's Compliance reporting Post Approval Requirements (2018), or its latest version.

100%

Eg:

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

The post-approval requirements 2018 has been updated and this audit is the first requirement to report.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

The post-approval requirements 2018 has been updated and this audit is the first requirement to report.

Compliance Status

Not Triggered

Unique Identification compliance status number

Schedule 4, Condition 7

100%

Within 6 months of the commencement of construction, or as directed by the Secretary, the Applicant must commission and pay the full cost of an independent Environmental Audit of the development. The audit must:

- (a) Be prepared in accordance with the relevant Independent Audit Post Approval Requirements (DPE 2018);
- (b) Be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- (c) be carried out in consultation with the relevant agencies
- (d) Assess whether the development complies with the relevant requirements in this consent; and

100%

- (e) Recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary.

Eg: Has the audit been commissioned before the 1/03/2021?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Evidence of this audit.

Take a photograph of evidence (if applicable)

Independent audit findings and recommendations

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Compliance Status

Compliant

Unique Identification compliance status number

Schedule 4, Condition 8

100%

Access To Information

8. The Applicant must:

(a) Make the following information publicly available on its website as relevant to the stage of the development:

- The EIS
 - The final layout of the plans for the development
 - Current statutory approvals for the development
 - Approved strategies, plans or programs required under the conditions of this consent
 - The proposed staging plans for the development of the construction, operation or decommissioning of the development is to be staged
 - Compliance reports
 - How complaints about the development can be made
 - A complaints register
 - Any independent environmental audit, and the Applicant's response to the recommendations in any audit; and
 - any other matter required by the Secretary; and
- Keep this information up to date.

100%

Eg: Outline what documents are currently on the website and when they were uploaded. Is there more current versions? Is there a schedule for checking/ updating to the website?

Evidence Collected

Include relevant records, documents and reports (including details such as any relevant document reference, the date of the document, revision number and author)

Provide Evidence here

Canadian Solar website, 30/3/2021 that has direct links to the DPIE website for all management plans, approvals, complaints forms and compliance. The Canadian Solar website also has a contact section and all management plans and site layout.

PCL doesn't have an Australian website. The US website is www.pcl.com/us/en

Take a photograph of evidence (if applicable)**Independent audit findings and recommendations**

Summarize the effectiveness of the measures in place based on the evidence provided. Provide any Recommendations or Opportunities for Improvement

Review website

Compliance Status

Compliant

Unique Identification compliance status number

Untitled page

100%

Yes

On Site Forms

100%

On Site Forms

Yes

Appendix



Photo 1



Photo 2

 non Compliance email.pdf



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7.2 APPENDIX B -PLANNING SECRETARY AUDIT TEAM AGREEMENT

Mrs Chelsea Milles
Project Development Manager
Gunnedah Solar Farm Pty Ltd
Level 10 15 GREEN SQUARE CLOSE
FORTITUDE VALLEY QLD 4006

22/01/2021

Dear Ms Milles

**Gunnedah Solar - Auditor Endorsement (SSD-8658)
Independent Environmental Audit**

I refer to Gunnedah Solar Farm Pty Ltd's (Gunnedah Solar) submission, dated 21 January 2021, seeking the agreement of the Secretary of the Department of Planning, Industry and Environment (the Department) of a suitably qualified, experienced and independent audit team to undertake an Independent Environmental Audit (IEA) of the development.

In accordance with Schedule 4, Condition 7(b) of PA 09_0182 (the Approval) and the Department's *Independent Audit Post Approval Requirements (2018)*, the Secretary endorses the following audit team:

- Shonelle Gleeson-Willey – Lead Environmental Auditor;

The Independent Audit must be prepared, undertaken and finalised in accordance with the Department's *Independent Audit Post Approval Requirements (2018)*. 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 audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

The Department notes that the project commenced construction on 1 October 2020. In accordance with Schedule 4, Condition 7 the IEA must be commissioned by 1 April 2021.

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

If you have any questions, please contact James Epstein, Senior Compliance Officer, on (02) 6575 3419 or email to compliance@planning.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink that reads "H Watters". The "H" is stylized with a large loop, and the "Watters" is written in a cursive script.

Heidi Watters
Team Leader Northern
Compliance

As nominee of the Planning Secretary



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7.3 APPENDIX C- CONSULTATION



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0419 444 669

ABN 53 126 494 776

admin@mossenviro.com

www.mossenviro.com

PO Box 390, Tamworth NSW 2340

9/02/2021

Department of Planning, Industry and Environment

Via email (James.Epstein@planning.nsw.gov.au and Heidi.watters@planning.nsw.gov.au)

Dear Mr. James Epstein and Ms Watters,

I refer to the Gunnedah Solar Farm Pty Ltd. (SSD 8658) as the approved Lead Auditor by the Department of Planning, Industry and Environment (the Department) and endorsed by the Secretary.

This letter is hereby to acknowledge and conduct the consultation requirement under the Independent Audit Post Approval Requirements (2020) - Section 3.2 for the Scope development of the Gunnedah Solar Farm.

"The auditor must consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit." (Page. 8)

As indicated in the above exert, I would like to enquire if the department has any requests for consultation with other parties or agencies including the Community Consultative Committee?

Please advise of any Department requests in writing, that may be applicable to the Scope of audit.

Kind regards,

Shonelle Gleeson-Willey

As the Approved Lead Environmental Auditor 22/01/2021

CC: a.mcintosh@mossenviro.com.au

PCannington@pcl.com

From: [Shonelle Gleeson-Willey](#)
To: [Angus McIntosh](#)
Cc: [Celanie Meyer](#)
Subject: FW: Consultation requirements SSD 8658
Date: Tuesday, 9 February 2021 4:34:50 PM
Attachments: [image001.png](#)
[image007.png](#)

See below for the response from DPIE.

Shonelle Gleeson-Willey

Director and Principal Consultant

PO Box 390, Tamworth NSW 2340

Ph: 0419 444 669

E: s.gleeson-willey@mossenviro.com.au

Web: www.mossenviro.com.au



From: James Epstein <James.Epstein@planning.nsw.gov.au>
Sent: Tuesday, 9 February 2021 1:15 PM
To: Shonelle Gleeson-Willey <s.gleeson-willey@mossenviro.com.au>; Heidi Watters <Heidi.Watters@Planning.nsw.gov.au>
Subject: RE: Consultation requirements SSD 8658

Good afternoon Shonelle,

Thank you for your letter consulting with the Department regarding the upcoming audit of the Gunnedah Solar Farm.

The Department requests that during the audit particular attention is given to the following:

- Schedule 3 Condition 9 – implementation of the Traffic Management Plan;
- Schedule 3 Condition 11 – implementation of the Landscape Management Plan; and
- Schedule 3 Condition 16 – onsite air quality management

If you have any questions I can be contacted on the details provided below.

Regards

James Epstein

Senior Compliance Officer

Energy, Industry and Compliance | Planning & Assessment

Department of Planning, Industry and Environment

T 02 6575 3419 | M 0429 395 691 | E james.epstein@planning.nsw.gov.au

PO Box 3145, Singleton NSW 2330

www.dpie.nsw.gov.au



Planning,
Industry &
Environment

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

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

The Department has recently upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).



Please consider the environment before printing this e-mail.

From: Shonelle Gleeson-Willey <s.gleeson-willey@mossenviro.com.au>

Sent: Tuesday, 9 February 2021 12:34 PM

To: James Epstein <James.Epstein@planning.nsw.gov.au>; Heidi Watters <Heidi.Watters@Planning.nsw.gov.au>

Subject: Consultation requirements SSD 8658

Good morning,

Please find attached our acknowledgment and request for the appropriate consultation requirements in relation to the post-approval audit for SSD 8658.

Shonelle Gleeson-Willey

Director and Principal Consultant

PO Box 390, Tamworth NSW 2340

Ph: 0419 444 669

E: s.gleeson-willey@mossenviro.com.au

Web: www.mossenviro.com.au



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I'm Speaking at the IECA
Virtual Annual Conference
Feb. 22-25, 2021

Join me and register at
www.ieca.org/annual21



GSF Audit - Staff Interviews

29 Mar 2021 / Shonelle Gleeson-Willey

Complete

Score	0%	Failed items	0	Actions	0
Conducted on				29th Mar, 2021 10:59 AM AEDT	
Prepared by				Shonelle Gleeson-Willey	
Location				Gunnedah Solar Farm, Gunnedah NSW	

Inspection

Gunnedah Solar Farm - Staff Interview

Introduction

Name of interviewed staff member and list their position description

David Gooding- Construction Manager

Schedule 3 Condition 9: Implementation of the Traffic Management Plan

Were you involved with the consultation process between RMS, Council and the Secretary regarding the Traffic Management Plan? If not, why not?

No

Do you think the current Traffic Management Plan and Drivers code of conduct is effective? Give reasons how and why you believe the Plan is or is not effective.

Yes its effective when its working (because we are dealing with truckies). I've been dealing with the trucking companies and the Client on a weekly basis involving Paul and myself to inform trucking companies of the TMP requirements and we get tracking numbers for all trucks. We have had two incidents, truck on Orange Grove Rd that nearly ran a vehicle off the road. I sent out more emails on speed limits as a follow up and doing driver aware training. If we have new companies coming on board we speak to the company managers and drivers and do spot site checks. I have sat on the Bridge to make sure that drivers are following the TMP. second incident was truck going over the bridge that was sent to DPIE then we stopped all deliveries to site and sent a stern email to all trucking companies to reeducate their drivers. WE send an online induction that covers everything from PPE and speed limits to protocols and follow the TMP and the drivers have to sign that. There are repercussions for trucking companies after a first warning or any breaches the company is suspected from site.

**Have the approvals listed in section 1.5.4 of the sites Traffic Management Plan been obtained?
ie:**

- Roads Act 1993: Section 138 Approval for work within a Public road, Orange Grove Road and Old Blue Vale Road
- Heavy Vehicle National Law Permit National Class 2 B- double authorization Notice 2019 (No.1)
- Dilapidation Survey to be approved by Council

Yes all have been obtained.

Has there been any complaints received in relation to traffic since beginning construction?

no other than the two mentioned above.

How has the monitoring and response to climate and wet weather been achieved?

We have a dewatering program onsite, either myself, Mark or Paul will assess the site after rain to determine if the site is safe. Site will be shut down if unsafe. dewatering procedure will be instigated. Prior to predicted heavy rain we have cut extra culverts in the road and drainage ditches. dirty stormwater is collected off the site and directed into the land owners drainage channels which is then pumped into the farm dams and used for irrigation. Sediment fencing is used elsewhere to prevent other offsite discharge of dirty water.

How many warnings have been issued under infringements of Drivers Code of Conduct?

1

How is the community notified about traffic related impacts?

On the company website for Gunnedah Solar Farm. letter box drop and contact details on the front gate is me as the point of contact.

Has the sites flood response plan been enacted since beginning construction? If so how effective was the plan in mitigating traffic?

The flood management plan hasnt been enacted. We have however worked around the flooding by stopping trucks coming to site last week Thurs/Fri based on predicted flooding (150mm predicted). Vehciles were moved to higher ground. We stopped light vehciles from going over the bridge.

Schedule 3 Condition 11: Landscaping Plan

Who is responsible for monitoring, reviewing and implementing the plan timeframes for completion of actions?

Myself ,Paul or Mark. We have spoken to the company who has won the job. They have come out for a site visit (Armidale Tree Group). In another 4-6 weeks we will get them back down to have another look. The seedlings have been started in the nursery in Armidale and the design has been approved. The hold points could be monitored by Paul or myself but Jeff will decide, it could be several people.

When was the landscaping plan completed on site?

Landscaping design was completed in Sep/Oct 2020. Pre-Christmas.

How is the program to monitor and report on the effectiveness of the landscaping plan and in particular the screening of infrastructure on site managed?

There have been shading studies done and approved. Having the right trees to make sure it doesn't affect the panels and block the neighbours visual of the panels. We will have more consultation with neighbours.

Is this program likely to achieve effective screening of site infrastructure within 3 years?

I believe so, yes. we get getting established trees planted. Armidale Tree Group will be doing the monitoring of growth. Canadian solar would send an environmental site to check on progress against the contract.

Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

Water trucks and have reduced the site speed limit from the original TMP from 40km/hr to 20 km/hr. There are normally 2 trucks on rotation. We have an agreement with the next door farmer to use some of his dam water under the NSW Water license.

The Traffic Management Plan does not recognize vehicle movement as a source point for dust pollution. How is minimizing dust communicated to staff and contractors?

At 6:30am i have a water truck go along the water access road and carpark. Its also communicated through pre-starts.

Do you believe the site is actively managing this condition effectively? If not why not?

Yes

Chain of Command

How is the interaction with head office and the parent company conveyed?

We have 3 Zoom meetings a week with all (Canadian Solar, Senior Canadian Solar head office, PCL head office and site management staff), Canadian Solar rep on-site. Lots of meetings and daily reports are sent to Canadian Solar with photos. There are corresponding roles within Canadian Solar i.e. EHS person who comes to site for a visit.

Position Descriptions

How are the specific systems to each job roles demonstrated?

I have a position description. It contains environmental requirements. The chain of command is Jeff then me and Mark as the responsible party for all HSE.

Are each persons roles and responsibilities effectively captured in their position descriptions?

Yes my PD accurately reflects the main components of my role but the role is ever revolving.

Incident Management

What role have you had in incident management?

A large one, if there has been an incident then Paul would come to me or Mark straight away. I am involved in the investigation and lessons learned. Communicated through toolbox meetings and reinductions or reeducation. Giving specific roles for each task from the investigation.

Do you think effective corrective and preventative actions have been implemented following past incidents?

Yes past safety incidents corrective and preventative actions were effective. We will pick topics for the toolbox onsite, and we will pick relevant topical things. Examples are concrete wash out.. There are standard toolbox talks delivered at every induction and then paper based ones delivered on a daily pre-start.

We have environmental Control Plans which are in the safety register in the hard drive.

Risk Management

What do you see as the biggest environmental risk for the site and why?

Mice at the moment. because they are eating some of the panel cables. Mice wasnt one of the hazards assessed up front for the project. There are heaps of birds including falcons that eat the mice. I am getting quotes on zinc coated wheat kernels to control the mice either ariel or hand spreading. A big concern are the local dogs or birds eating poisoned mice. I see the impact on the environment being very low because this was a cotton farm.

What is the biggest challenge the site faces in the future?

Catastrophic events out of our control. Weeds mainly woody weeds that are creating unforeseen problems. Weeds are being mechanically managed and herbicide isn't currently being used.

Additional Questions

Pasture seed spreading will be all at the end of project for each of the three portions, so pasture seed will be spread to stabilise each section as its completed (3 sections to the whole farm in total). Because of the weeds we will consult with the land owner (Nathan) to see what he wants. I would like to see an Australian species put on the site to manage the weed problem. Sheep may work.



GSF Audit - Staff Interviews

29 Mar 2021 / Shonelle Gleeson-Willey

Complete

Score	0%	Failed items	0	Actions	0
Conducted on				29th Mar, 2021 3:09 PM AEDT	
Prepared by				Shonelle Gleeson-Willey	
Location				Gunnedah Solar Farm	

Inspection

Gunnedah Solar Farm - Staff Interview

Introduction

Name of interviewed staff member and list their position description

Jeff Ewert-Senior Construction Manager

Schedule 3 Condition 9: Implementation of the Traffic Management Plan

Were you involved with the consultation process between RMS, Council and the Secretary regarding the Traffic Management Plan? If not, why not?

No not personally. A basic TMP came with the basic TMP that we adopted and adapted into our TMP, I was involved with developing our plan.

Do you think the current Traffic Management Plan and Drivers code of conduct is effective? Give reasons how and why you believe the Plan is or is not effective.

Yes i think so, our online orientation has been a success. it gives the correct route with a diagram of the job site. I want to put some live drone shots in for better communication. We orientate drivers before they get here which I believe works best.

**Have the approvals listed in section 1.5.4 of the sites Traffic Management Plan been obtained?
ie:**

- Roads Act 1993: Section 138 Approval for work within a Public road, Orange Grove Road and Old Blue Vale Road
- Heavy Vehicle National Law Permit National Class 2 B- double authorization Notice 2019 (No.1)
- Dilapidation Survey to be approved by Council

Yes all done.

Has there been any complaints received in relation to traffic since beginning construction?

Yes there was 1 lady who is the mother in law of the land owner who almost got driven off the road by a truck and flat bed. It was found out that it wasn't us. Then we had 1 truck cross the bridge, DPIE came here to investigate so we hired a security guard who took photos of every truck crossing the bridge for a period of 2 weeks. There was another near non-compliance of a truck that had pulled up just before the bridge and was heading to this site but I pulled up and asked him where he was going.

How has the monitoring and response to climate and wet weather been achieved?

We meet with our traes every day at 2:30 and there is a structure of what we go over. We look at the weather forecast and discuss that. The land owner plugs some trenches to flood his cotton fields so we need good communication with him to ask plugs to be released so that our site doesnt flood. We pre-check sediment fencing and dams.

How many warnings have been issued under infringements of Drivers Code of Conduct?

1

How is the community notified about traffic related impacts?

letters put in mail boxes prior to construction before we started. There was also a write up in the newspaper. Plus we regularly communicate with Nathan the land owner through Paul because Paul is staying on their place.

Has the sites flood response plan been enacted since beginning construction? If so how effective was the plan in mitigating traffic?

Yes. This site has its own internal water management by using the canals. Over Christmas we found one area where our access road was holding water, we were able to get drone shots to see where water was being ponded.. The flood modelling requires check dams for 100 year flood. The 70mm over Christmas has a good learning to show us how to prepare the site for the future.

Schedule 3 Condition 11: Landscaping Plan

Who is responsible for monitoring, reviewing and implementing the plan timeframes for completion of actions?

PCLs responsibility to issue the contract to Armidale Tree Group. its up to us to schedule plantings and the monitor the effectiveness.

When was the landscaping plan completed on site?

Landscaping drawings were completed in the early stages of the project.

How is the program to monitor and report on the effectiveness of the landscaping plan and in particular the screening of infrastructure on site managed?

Maintaining and checking them under the warranty period. It will be ties into the contract of our sub-contractor. Once a month PCL people will come back approximately once a month to check warranty claims.

Is this program likely to achieve effective screening of site infrastructure within 3 years?

Yes.

Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

3 water trucks and now 2 full time water trucks. There is regular radio communication to ask for water in specific areas, but trucks also do a routine circuit. The required number of water trucks is in the civil contracts for our contractors. No additives just water from the farmers dam.

The Traffic Management Plan does not recognize vehicle movement as a source point for dust pollution. How is minimizing dust communicated to staff and contractors?

dDaily 2:30 meeting. in sub-contractor contracts.

Do you believe the site is actively managing this condition effectively? If not why not?

Yes, usually workers complain a lot about dust but on this site we have not less of these complaints than usual.

Chain of Command

How is the interaction with head office and the parent company conveyed?

Meetings. weekly on fridays to talk logistics, weekly meetings with Canadian solar as the Client Env, Safety. meeting minutes sent out every day, a forward look of the next 3 weeks is sent out in pictorial form. Weekly compliance reporting sent to PCL head office and goes to Canadian Solar as well.

Position Descriptions

How are the specific systems to each job roles demonstrated?

My main role is developing/building the team and putting the job together. Then I also work with Paul to develop the HSE plan and make sure its being implemented. Make sure that the 12 people on my team are doing their weekly inspections and auditing paperwork. implement quality plan, and make sure the job gets done. I also did the tendering for this project specifically. Right now I'm 50% on this project and I'll be 30% engaged before the end but here until comissioning.

Are each persons roles and responsibilities effectively captured in their position descriptions?

Yes for sure. I have a roles and responsibilities matrix for all team members. I will get you a copy of this. when hired by the company, there is a 1-page job description.

Incident Management

What role have you had in incident management?

Incidents will get reported to Paul but I'm on the email chain and will be notified. My role is to notify North America, then Ryan O'Connell takes the client notification. Landon reports to Ryan.

Do you think effective corrective and preventative actions have been implemented following past incidents?

Yes, when we do an incident report a part of it is lessons learned. This is disseminated to contractors for a tool box talk. We have a lessons learned for Env whilst building solar that is from all our solar projects in North America.

Risk Management

What do you see as the biggest environmental risk for the site and why?

typically heavy rain and flooding but due to the canal infrastructure we are protected quite well. Dust is a big issue when we were stripping topsoil for the roads. We needed to avoid high wind days.

What is the biggest challenge the site faces in the future?

Flooding is a concern because im worried that the flood modelling doesn't have the inverters high enough.

Additional Questions



GSF Audit - Staff Interviews

29 Mar 2021 / Shonelle Gleeson-Willey

Complete

Score	0%	Failed items	0	Actions	0
Conducted on		29th Mar, 2021 2:32 PM AEDT			
Prepared by		Shonelle Gleeson-Willey			
Location		Gunnedah Solar Farm			

Inspection

Gunnedah Solar Farm - Staff Interview

Introduction

Name of interviewed staff member and list their position description

Landon Douglas, Project Manager -Construction (PCL).

Schedule 3 Condition 9: Implementation of the Traffic Management Plan

Were you involved with the consultation process between RMS, Council and the Secretary regarding the Traffic Management Plan? If not, why not?

No, I've been with the project for under a month.

Do you think the current Traffic Management Plan and Drivers code of conduct is effective? Give reasons how and why you believe the Plan is or is not effective.

Yes, We have a specific on line induction and in that we have reference to our code of conduct that they need to follow. We also have plans for heavy traffic routes.

**Have the approvals listed in section 1.5.4 of the sites Traffic Management Plan been obtained?
ie:**

- Roads Act 1993: Section 138 Approval for work within a Public road, Orange Grove Road and Old Blue Vale Road
- Heavy Vehicle National Law Permit National Class 2 B- double authorization Notice 2019 (No.1)
- Dilapidation Survey to be approved by Council

Yep all obtained.

Has there been any complaints received in relation to traffic since beginning construction?

2. 1 for a heavy road on the bridge and 1 for a vehicle being run off the road.

How has the monitoring and response to climate and wet weather been achieved?

After heavy rain we have been doing environmental inspections and daily traffic inspections. Fortnightly traffic management plan inspections.

How many warnings have been issued under infringements of Drivers Code of Conduct?

1. for drivers of trucks going over the bridge.

How is the community notified about traffic related impacts?

letter box drops before my time.

Has the sites flood response plan been enacted since beginning construction? If so how effective was the plan in mitigating traffic?

No

Schedule 3 Condition 11: Landscaping Plan

Who is responsible for monitoring, reviewing and implementing the plan timeframes for completion of actions?

Our construction manager.

When was the landscaping plan completed on site?

We haven't started landscaping yet, The landscaping plan has been approved by Council.

How is the program to monitor and report on the effectiveness of the landscaping plan and in particular the screening of infrastructure on site managed?

Through our landscape management plan. By the end of next month we will start to implement the plan, weather dependent.

Is this program likely to achieve effective screening of site infrastructure within 3 years?

I believe we have an EIS , so yes I do believe it will be we will need to monitor and confirm.

Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

Two water trucks go around to mitigate the dust, we have lower speed limits 20 km/hr. We have been lucky with the amount of rain we have had.

The Traffic Management Plan does not recognize vehicle movement as a source point for dust pollution. How is minimizing dust communicated to staff and contractors?

Pre-start meetings everyday where these types of items are brought up. Speed signage. PSIs to follow the speed limit.

Do you believe the site is actively managing this condition effectively? If not why not?

Yes.

Chain of Command

How is the interaction with head office and the parent company conveyed?

We have weekly progress meetings with Canadian Solar to go through progress. The meeting always goes through Env and safety first. We also have daily phone calls. PCL head office is contacted weekly through emails and daily through phone calls. Canadian Solar is our Client and are quite hands on to make sure everything is moving properly. We have a CPSSC (communication per client specific) that goes into the different relationships between the two groups between Canadian Solar and PCL. There is also that we have delineated who to talk to about what as a document (project document)

Position Descriptions

How are the specific systems to each job roles demonstrated?

Through an environmental management strategy that outlines all the roles and responsibilities.

Are each persons roles and responsibilities effectively captured in their position descriptions?

Position description mentions environmental compliance and requirements.

Incident Management

What role have you had in incident management?

A incident will get reported and a group will get an instant email about the incident. Typically at this time I would notify Canadian Solar and we would put together a safety/env report and distribute to all the different stakeholders.

Do you think effective corrective and preventative actions have been implemented following past incidents?

Yes.

Risk Management

What do you see as the biggest environmental risk for the site and why?

Traffic management particularly trucks coming to site. because it has more obstacles to manage because we dont have full control of them, and different drivers.

What is the biggest challenge the site faces in the future?

Same as above - trucking.

Additional Questions



GSF Audit - Staff Interviews

29 Mar 2021 / Shonelle Gleeson-Willey

Complete

Score	0%	Failed items	0	Actions	0
Conducted on		29th Mar, 2021 10:29 AM AEDT			
Prepared by		Shonelle Gleeson-Willey			
Location		PCL Solar Farm, Gunnedah			

Inspection

Gunnedah Solar Farm - Staff Interview

Introduction

Name of interviewed staff member and list their position description

Mark Wintle. Electrical Supervisor and Civil Coordinator.

Schedule 3 Condition 9: Implementation of the Traffic Management Plan

Were you involved with the consultation process between RMS, Council and the Secretary regarding the Traffic Management Plan? If not, why not?

No

Do you think the current Traffic Management Plan and Drivers code of conduct is effective? Give reasons how and why you believe the Plan is or is not effective.

Its effective when drivers follow it. There are patrols put on the bridge to check that drivers are following the TMP and code of conduct. Trucks are photographed and send photos back to contractors to ID. There has bee 1 instance of a heavy vehicle not following the TMP which was reported and Paul investigated and self reported to DPIE. As a follow up the transport company that beached was contacted and resent the TMP and Code.

**Have the approvals listed in section 1.5.4 of the sites Traffic Management Plan been obtained?
ie:**

- Roads Act 1993: Section 138 Approval for work within a Public road, Orange Grove Road and Old Blue Vale Road
- Heavy Vehicle National Law Permit National Class 2 B- double authorization Notice 2019 (No.1)
- Dilapidation Survey to be approved by Council

Dilapidation survey has been done because i arranged it. My understanding is that the other approvals were granted.

Has there been any complaints received in relation to traffic since beginning construction?

not that im aware of.

How has the monitoring and response to climate and wet weather been achieved?

As soon as it rains its almost imposible to get onto site. We montor the BOM closely and we have weather stations on site which are phone app based and a rain guage.

How many warnings have been issued under infringements of Drivers Code of Conduct?

1

How is the community notified about traffic related impacts?

There was a leaflet letter box drop prior to construction regarding truck deliveries but it didnt say how many or when.

Has the sites flood response plan been enacted since beginning construction? If so how effective was the plan in mitigating traffic?

After monitoring the BOM website last week we saw heavy rain predicted and put in additional drainae and erosion controls. We have an erosion and sediment control plan that is updated monthly.

Schedule 3 Condition 11: Landscaping Plan

Who is responsible for monitoring, reviewing and implementing the plan timeframes for completion of actions?

PCL has to plant trees prior to operation and monitor the trees for 3 years but there are no requirements for during construction.

When was the landscaping plan completed on site?

NA

How is the program to monitor and report on the effectiveness of the landscaping plan and in particular the screening of infrastructure on site managed?

No, because its during operation. There's three years worth of monitoring after construction finishes.

Is this program likely to achieve effective screening of site infrastructure within 3 years?

NA

Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

Visual monitoring by all the construction team. Guys in the field would contact their supervisor if they were being effected by dust. Water trucks are used to minimise dust and are on-site everyday.

The Traffic Management Plan does not recognize vehicle movement as a source point for dust pollution. How is minimizing dust communicated to staff and contractors?

There is a 20 km/hr speed zone enforced and the office project team monitor the road for dust issues from the office.

Do you believe the site is actively managing this condition effectively? If not why not?

Yes.

Chain of Command

How is the interaction with head office and the parent company conveyed?

Weekly meetings with Canadian Solar and the construction team is involved. Canadian Solar regularly visit site. chain of command is all through Jeff Hewitt who is the conduit to Canadian Solar.

Position Descriptions

How are the specific systems to each job roles demonstrated?

I have a written position description which is a general company wide one. All staff have annual reviews of their positions.

Are each persons roles and responsibilities effectively captured in their position descriptions?

Yes mine is.

Incident Management

What role have you had in incident management?

If its an incident involving the sub-contractors im supervising then i would be a lead investigator under Paul Cannington.

Do you think effective corrective and preventative actions have been implemented following past incidents?

No environmental incidents, some safety incidents have happened. I believe that effective preventative actions have been implemented for past safety incidents. There is a formal incident procedure that allows for corrective and preventative actions.

Risk Management

What do you see as the biggest environmental risk for the site and why?

Flood. Because we would have almost 900mm of water which would prevent access. Heat during summer is another one.

What is the biggest challenge the site faces in the future?

Flood definitely. Site access and construction would stop but its designed to 1 in 100 yr flood / or 1 in 200 yr flood and if this happens then electricity generation would become a problem. If the water level exceeded design then the junction boxes could be inundated.

Additional Questions



GSF Audit - Staff Interviews

29 Mar 2021 / Shonelle Gleeson-Willey

Complete

Score	0%	Failed items	0	Actions	0
Conducted on				29th Mar, 2021 2:03 PM AEDT	
Prepared by				Shonelle Gleeson-Willey	
Location				Gunnedah Solar Farm	

Inspection

Gunnedah Solar Farm - Staff Interview Introduction

Name of interviewed staff member and list their position description

Sri Sahaarengan. Project Manager (field support)

Schedule 3 Condition 9: Implementation of the Traffic Management Plan

Were you involved with the consultation process between RMS, Council and the Secretary regarding the Traffic Management Plan? If not, why not?

No not personally.

Do you think the current Traffic Management Plan and Drivers code of conduct is effective? Give reasons how and why you believe the Plan is or is not effective.

I do think its effective but we don't have a drivers code of conduct. the drivers have a delivery information sheet that provides some additional information.

Have the approvals listed in section 1.5.4 of the sites Traffic Management Plan been obtained?

ie:

- Roads Act 1993: Section 138 Approval for work within a Public road, Orange Grove Road and Old Blue Vale Road
- Heavy Vehicle National Law Permit National Class 2 B- double authorization Notice 2019 (No.1)
- Dilapidation Survey to be approved by Council

Yes those are all approved and mentioned in the TMP.

Has there been any complaints received in relation to traffic since beginning construction?

Yes there were 2. 1 relating to us 1 was assumed to be us but was not.

How has the monitoring and response to climate and wet weather been achieved?

After heavy rain fall we have our environmental checklist. In prep for heavy rain we have the pre-job safety and hazard inspections. Fortnightly traffic management plan.

How many warnings have been issued under infringements of Drivers Code of Conduct?

1

How is the community notified about traffic related impacts?

Pre construction Letter box drop and another letter box drop for extended construction hours saying that there will be additional traffic on weekends and public holidays.

Has the sites flood response plan been enacted since beginning construction? If so how effective was the plan in mitigating traffic?

It has been engaged but not enacted because we didnt get a flood. The farmer has been engaged and we use the trench system to divert water straight into the farm dam.

Schedule 3 Condition 11: Landscaping Plan

Who is responsible for monitoring, reviewing and implementing the plan timeframes for completion of actions?

PCL and we have a contractor to meet the work according to timeframes. The construction manager will have timeframes in place to make sure works are completed according to the required time frame.

When was the landscaping plan completed on site?

No on-site works have started. We are waiting for fencing to be completed in a month and a half before planting commences.

How is the program to monitor and report on the effectiveness of the landscaping plan and in particular the screening of infrastructure on site managed?

It will be up to our sub contractor. It is included in their contract. There will be a PCL contractor on-site for contractor set-up then a review will take place on site. The land owner will also be represented because the landscaping will be handed over at 3 years post commissioning.

Is this program likely to achieve effective screening of site infrastructure within 3 years?

I hope so. We had a third party come out and do a site assessment who then passed it onto Armidale Tree Group.

Schedule 3 Condition 16: Dust (Air Quality Management)

How is dust monitored on site and minimized?

Two water carts on-site that does the run. It depends on daily site activities. Discussed in pre-starts and day before in site meeting. Speed zones and enforced on-site to limit dust.

The Traffic Management Plan does not recognize vehicle movement as a source point for dust pollution. How is minimizing dust communicated to staff and contractors?

Daily 2:30pm meeting and pre-start meetings. All sub-contractors attend the 2:30 daily meeting. each sub-contracto has their own pre-start where there is PCL representation. No neighbour complaints.

Do you believe the site is actively managing this condition effectively? If not why not?

Yes

Chain of Command

How is the interaction with head office and the parent company conveyed?

PIE concent is with Canadian Solar.
We have daily scheduled meetings.
PCL relationship is a good one and
very open.

Position Descriptions

How are the specific systems to each job roles demonstrated?

Captured in the roles and responsibility matrix. and environmental management plans. it explains my role as the PM and the supports i need within the EMP.

Are each persons roles and responsibilities effectively captured in their position descriptions?

Yes

Incident Management

What role have you had in incident management?

Incidents are reported to Paul who then informs myself and Landon. Everything is documented in Safety Management Center (depending on the type of hazard, A,B,C and each one has a timeframe that needs to be met). We have to fill in the details immediately into the system then corrective actions are initiated which have timelines for close out. Canadian Solar and relevant sub-contractors are then informed.

C- 1 week

B-3-4 days

A-1 day

Do you think effective corrective and preventative actions have been implemented following past incidents?

I think so. The traffic incident. all traffic was shut down so we could investigate. We brought all sub-contractors in for re-training and I believe that everyone has bought into the process.

Risk Management

What do you see as the biggest environmental risk for the site and why?

Dust has been the biggest risk on
past projects. The weather recently
has helped with the dust.

What is the biggest challenge the site faces in the future?

35 years design life. Waste disposal of panels after the 35 year life. and rehabilitation of the land after the 35 years especially because decommissioning will require more disturbance. Canadian Solar will have the decommissioning plan for end of life.

Additional Questions



7.4 APPENDIX D – MEETING ATTENDEE REGISTER



🏠 PO Box 390, Tamworth NSW 2340

Gunnedah Solar Farm Audit - Meeting Attendee Register

Page 1 of 2



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7.5 APPENDIX E – INDEPENDENT AUDIT DECLARATION FORM

Declaration of Independence - Auditor

Project Name: Gunnedah Solar Farm

Consent Number: SSD8658

Description of Project: Installation of a large-scale solar farm in the Gunnedah area to generate renewable energy.

Project Address: Gunnedah, NSW, 2380

Proponent :Gunnedah Solar Farm Pty Ltd

Date: 21/01/2020

I declare that:

- I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- I am not an Environmental Representative for the project; and
- I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow 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 Proposed Auditor: Shonelle Gleeson-Willey

Signature:

S. Gleeson-Willey

Qualification:

- Master of Environmental Management - UNE
- Bachelor of Applied Science (Environmental Management and Tourism) – UWS
- Certified Professional of Erosion and Sediment Control (CPESC) – International Erosion Control Association
- Certified Environmental Practitioner (CEnvP)
- Infrastructure Sustainability Accredited Professional (ISAP)

Company: *Moss Environmental*

Company Address: Level 2, 24 Fitzroy Street, Tamworth NSW 2340



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7.6 APPENDIX F – SITE INSPECTION AND PHOTOGRAPHS



GSF Audit - Site Inspection

30 Mar 2021 / Shonelle Gleeson-Willey

Complete

Score	37.5%	Failed items	0	Actions	1
Conducted on	30th Mar, 2021 12:53 PM AEDT				
Prepared by	Shonelle Gleeson-Willey				
Location	Orange Grove NSW 2380 Australia (-30.94993592483731, 150.3429877440802)				

Actions

1 action

Inspection / Key areas for site inspection: / Storage and Handling of Dangerous Chemicals

-Chemicals are stored and signed in accordance with Australian standards? (S3,28)

-Is the Substation bunded? (S3,C28)

-Any evidence of Spills?

Observation description

Minimal chemical usage on site. Storage of fuels and oils was observed during the audit and noted as adequate. However, handstand and bunding at refuelling pods is recommended .

To do | Priority **High** | Due **23rd May, 2021 9:39 PM AEST** | Created by **Shonelle Gleeson-Willey**

Provide more extensive training to staff and sub-contractors who are conducting environmental site inspections. PCL currently uses a risk identification type of site assessment. Inspectors need to be competent in identifying the risks.

Inspection

1 action, 37.5%

Key areas for site inspection:

1 action, 37.5%

Public Property

-Any public property located on site? (S3, C 11)

Observation description

No public property is located on-site

Observation photo

Observation Location

Observation description

No public property

Observation photo

Observation Location

Traffic Management

-Inspect site vehicle log book (or similar) to assess the number of vehicles accessing site (No more than 50 a day during construction, no more than 2 over dimensional or 5 heavy vehicle movements a day) (S3, C1)

-Are all vehicles travelling to and from site using access points and leaving in a forward motion?

-Are all heavy vehicles using the specified roads eg: Kamilaroi Highway, Blue Vale road, Old Blue Vale Road, Kelvin Road, Orange Grove Road, (S3, C3)

-Are upgrades to Old Blue Vale Road complete and within 100m of intersection at Kelvin Road and Blue Vale Road? (S3, C4a)

-Do the above roads allow for two-way heavy vehicle traffic (S3,C4)?

-Has the loose gravel material at the Old Blue Vale road and Kelvin Road intersection been removed? (S3, C4b)

-Has the access points been upgraded with a rural property access type treatment to cater for the largest vehicle accessing the site? (S3, C6)

-Is there any damage to the public roads caused by the heavy vehicles on site? (S3, C7)

Observation description

The heavy vehicle tracking spreadsheet was observed during the audit, showing the total number of vehicle movements on and off site does not exceed the approved numbers. During the site inspection, the boundary was travelled to ensure that there were no heavy vehicle access points other than the approved ones being used. Heavy vehicles were observed using the approved access route and the site inspection showed no signs of site access by heavy vehicles through any of the other access points.

I observed the road surface and width of the above mentioned roads and within 100m of the intersection with Kelvin and Blue Vale roads. The road surface and width was compliant. The site access has been upgraded for width, gravel surface and intergity to allow for heavy vehicles. There was no damage to the public road observed that could be attributed to the heavy vehicles from the Gunnedah Soalr Farm project.

Observation photo

Photos of the site access road, heavy vehicle tracking spreadsheet, project entry way, Orange Grove Road



Photo 1

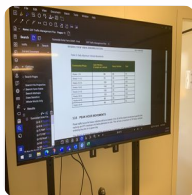


Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7

Observation Location

Site entry and access road, heavy vehicle movement spreadsheet.

Observation description

Observation photo

Observation Location

Observation description


Photo of the sign posted speed limit. All vehicles entering and exiting the site were observed to be abiding by the site speed limit.

Observation photo

Sign posted speed limit on the project site.



Photo 8

Observation Location	Gunnedah Solar Farm access road.
Observation description	
Observation photo	
Observation Location	
Vegetation Buffer -A vegetation buffer is in place? (S3, C10) -The vegetation buffer is located wholly in Lot 2 of the site? (S3,C10)	
Observation description	the vegetation buffer will be planted within the next month. The approval wording, requires planting prior to operations commencing.
Observation photo	
Observation Location	
Observation description	
Observation photo	
Observation Location	
Land Management -Are there any weeds on site that aren't being managed? (S3,C13) -Is ground cover being restored in areas affected by construction? (S3,C13)	
Observation description	There was minimal weed infestation observed, but during the site inspection the auditor observed small numbers of Bathurst burr,cotton, and a rolley polley bush, which were not being controlled. Manual slashing and removal are the only methods used on site
Observation photo	
Bathurst Burr minor infestation	
	
Photo 9	
Observation Location	

Observation description

Observation photo

Observation Location

Dust

-Is Dust visible and/or prominent on site? (S3, C16)

Observation description

A Water cart was observed on-site and the road into the site had been wet down earlier in the day. The water cart was not in operation during the initial part of the site inspection or audit and dust from vehicles using the internal access tracks was observed. However, the cart was observed spraying the site roads on the first morning of the audit and during the second part of the site inspection.

Observation photo

Landscape view of the project site from the closest property (land owner), showing no visible signs of dust.



Photo 10

Observation Location

Observation description

Observation photo

Observation Location

Visual

-Is the infrastructure on site "blending in" (including paint colors) (S3,C17)

Observation description

Yes

Observation photo

View of the project taken from the closest property (land owner). The project buildings and solar array is barely visible, with no glare or reflections evident.



Photo 11

Observation Location

Observation description

Observation photo

Observation Location

Flood Management

-Is the site perimeter secured with drop down fencing at the locations outlined in Appendix4 (S3,C22)

Observation description

The drop down fence was observed. The auditor later viewed the design, and it was noted that the fence does not comply with fence design for 45 deg bend at top of the post. This was discussed with Paul Cannington during the audit. It was confirmed that the fence design had been changed by the designers so that it does not include the 45 deg bend.

Observation photo

Photos of the drop down fence. Close inspection showed that the mesh was clipped as required with easy fail clips along the lowest strainer and that the mesh would disengage from the strainer wires as required during a flood.

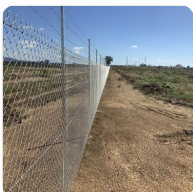


Photo 12



Photo 13

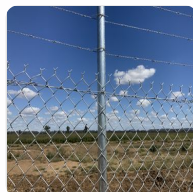


Photo 14



Photo 15



Photo 16

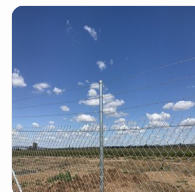


Photo 17



Photo 18



Photo 19

Observation Location

Observation description

Observation photo

Observation Location

Operating Conditions

-Is there evidence of soil erosion? (S3,C23)

-Is erosion being minimised?

Observation description

No evidence of soil erosion

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Water Pollution

-Any water pollution evident on site? (S3,C26)

Observation description

No evidence of water pollution

Observation photo

Site storm water collection channels.



Photo 20

Observation Location

Observation description

Observation photo

Observation Location

Hazards

-The site has a 20,000 litre water supply tank fitted with a 65mm storz fitting adjacent to the internal access road? (S3, C27)

Observation description

The tank is an operational requirement, therefore not required at this stage.

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Storage and Handling of Dangerous Chemicals
-Chemicals are stored and signed in accordance with Australian standards? (S3,28)
-Is the Substation bunded? (S3,C28)
-Any evidence of Spills?

1 action

Observation description

Minimal chemical usage on site. Storage of fuels and oils was observed during the audit and noted as adequate. However, handstand and bunding at refuelling pods is recommended .

To do | Priority High | Due 23rd May, 2021 9:39 PM AEST | Created by Shonelle Gleeson-Willey

Provide more extensive training to staff and sub-contractors who are conducting environmental site inspections. PCL currently uses a risk identification type of site assessment. Inspectors need to be competent in identifying the risks.

Observation photo

Examples of chemical and fuel storage across site.



Photo 21

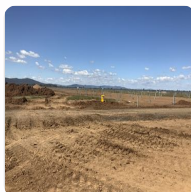


Photo 22



Photo 23

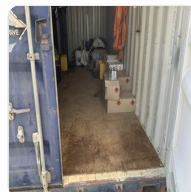


Photo 24

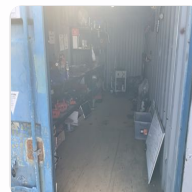


Photo 25



Photo 26

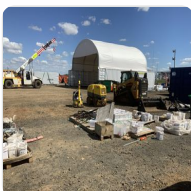


Photo 27

Observation Location

Observation description

Observation photo

Observation Location

Waste

-Is waste being minimized on site and disposed of correctly?

Observation description

Yes, the waste separation was observed both inside the site buildings and in external skip bins. waste separation was excellent.

Observation photo

Observation Location

Observation description

Observation photo

Observation Location

Site Training

Obtain 3x names of staff on site and 1 contractors name and check all staff are suitably trained for their roles within the training register. Are they all inducted?

The training register was sighted, and it was verified that all staff are generally up-to-date with the required training, however some of the newer staff have not yet completed all the required training.

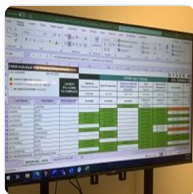


Photo 28



Photo 29

Other Observations from inspection

37.5%

EIS MM G5 Observe evidence of mud and debris being removed from vehicles prior to leaving site.

A double wide cattle grid has been installed at the site entrance to act as a rumble grid.

Observation Location

Observation photo

Observation description

EIS MM G5 Observe evidence of mud and soil being removed from the local roadway (equipment used/log)

Cattle grid used

Observation photo

Evidence that mud and debris is not being tracked onto local roads.



Photo 30



Photo 31



Photo 32

Observation Location

Observation description

EIS MM B1 Observe 10m vegetation buffer between perimeter of remnant vegetation stands (V1, V2 and V3) and works

Observed

Observation photo

Vegetation buffer exceeds the required 10m.



Photo 33



Photo 34



Photo 35



Photo 36

Observation Location

Observation description

EIS MM B4 Observe evidence of trench backfilling ASAP and early morning trench inspections for fauna.

Trenches were not observed, as there were no open trenches at the time of the audit.

Observation photo

Observation Location

Observation description

EIS MM B5 Observe speed limits of 20km/hr on internal roads

Yes

Observation photo

Observation Location

Observation description

☒ **EIS MM L3 Observe evidence of the landscape management plan implementation.**

The perimeter fencing is partially complete. Remnant vegetation that was required to be retained has been retained.

Observation photo

Observation Location

Observation description

DGB is used on temporary construction roads. White gravel used on road from blue vale road to compound

☒ **EIS MM V1 & V3 Observe evidence of visual screening in place and stabilised tracks but not bitumen or other dark coating.**

DGB is used on temporary construction roads. White gravel used on road from blue vale road to compound. The remnant vegetation which was required to be retained has been. No additional screening plantings have commenced at the time of the audit.

Observation photo

Remnant stand of trees visible.



Photo 37



Photo 38

Observation location

Observation description

☒ **EIS MM V6 Observe are areas being progressively stabilised with pasture grass?**

Success rate has been poor and coverage is not yet at 70%

Observation photo



Photo 39

Observation location

Observation description

Not observed

☒ **EIS MM T5 Observe the traffic control in accordance with the TMP.**

Observation photo

Observation location

observation description

☒ **EIS MM SW2 Observe progressive disturbance and remediation in site inspection**

Progressive rehabilitation was observed. Minimal erosion along the sides of some access tracks was noted.

Observation photo



Photo 40

Observation location

Observation description

- ☒ EIS MM SW3 Observe that solar panel arrays are far enough apart to allow ground cover and weed control

Observation photo

The solar panels are spaced widely enough to allow a small tractor or side-by-side with small spray boom to pass between each row.



Photo 41



Photo 42

Observation location

Observation description

- ☒ EIS MM SW4 Observe refueling at least 40m away from waterways

Observation photo

Refueling is done by double walled, self bunded pods. These are more than 40m away from any waterway.



Photo 43



Photo 44

Observation location

Observation description

- ☒ EIS MM S3 Observe separation of topsoil and subsoil during trenching

Separation stockpiles were observed on the northern site boundary.

Observation photo

Observation location

Observation description

- ☒ EIS MM S4 Observe dust management measures

Observation photo

Water cart and stand pipe observed. Wet roads observed each morning and after lunch during the site inspection.



Photo 45



Photo 46



Photo 47

Observation location

Observation description

- ☒ EIS MM S6 Observe a stabilised entrance

The site entrance is stabilised with compacted subgrade and light coloured gravel.

Observation photo

Observation location

Observation description

- ☒ EIS MM BF6 Observe a 15m wide APZ around the perimeter

The 15m wide APZ was observed.

Observation photo

15m wide APZ.



Photo 48

Observation location

Observation description

- ☒ EIS MM BF10 Observe a water supply tank with a capacity of 50,000L outside the APZ near the substation

Not required during construction

Observation photo

Observation location

Observation description

- ☒ EIS MM A3 Observe dust suppression

Watercarts observed, wet roads observed.

Observation photo

Observation location

Observation description

- ☒ EIS MM W1 Observe waste management practices

Observation photo

Waste separation is carried out in the laydown area.



Photo 49



Photo 50



Photo 51

Observation location

Observation description

- ☒ EIS MM EHP Observe upgrade to site access point off Orange Grove Road to allow for the largest vehicle accessing the site, inc sealing the on-site access road a min of 30m from its intersection with Orange Grove Road.

The site access has been upgraded by widening, sealing with compacted sub-grade and light coloured gravel and a rural style fence and entrance.

Observation photo

Observation location

Observation description

Other

Other photo

Other location

Other description

Training

Other

Other photo

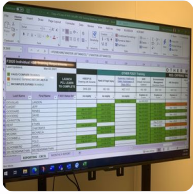


Photo 52



Photo 53

Other location

Appendix



Photo 1

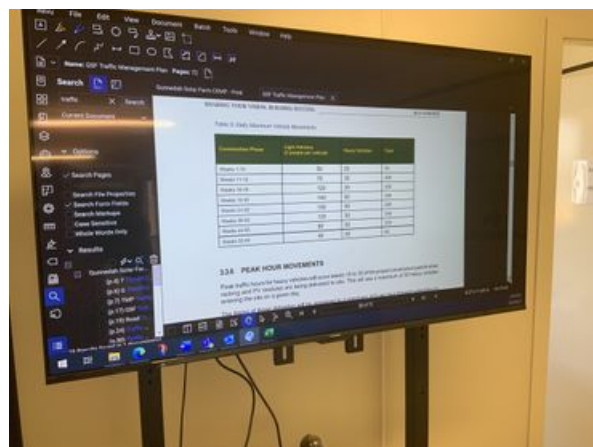


Photo 2



Photo 3



Photo 4



Photo 5



Photo 6



Photo 7



Photo 8



Photo 9



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14



Photo 15



Photo 16



Photo 17



Photo 18



Photo 19



Photo 20



Photo 21



Photo 22



Photo 23



Photo 24



Photo 25



Photo 26



Photo 27

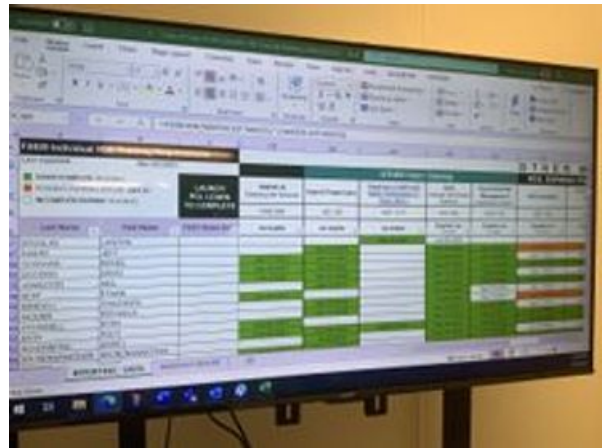


Photo 28

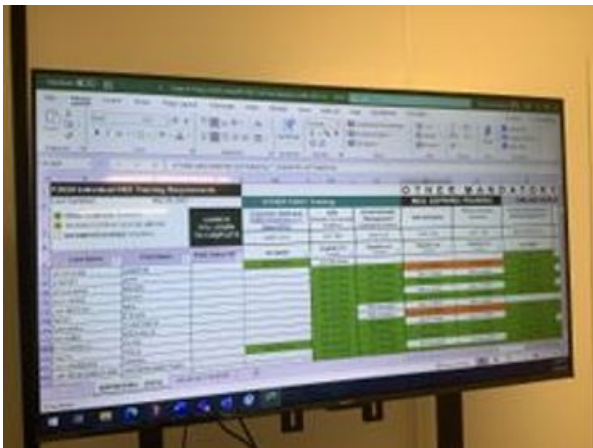


Photo 29



Photo 30



Photo 31



Photo 32



Photo 33



Photo 34



Photo 35



Photo 36



Photo 37



Photo 38



Photo 39



Photo 40



Photo 41



Photo 42



Photo 43



Photo 44



Photo 45



Photo 46



Photo 47



Photo 48



Photo 49



Photo 50



Photo 51

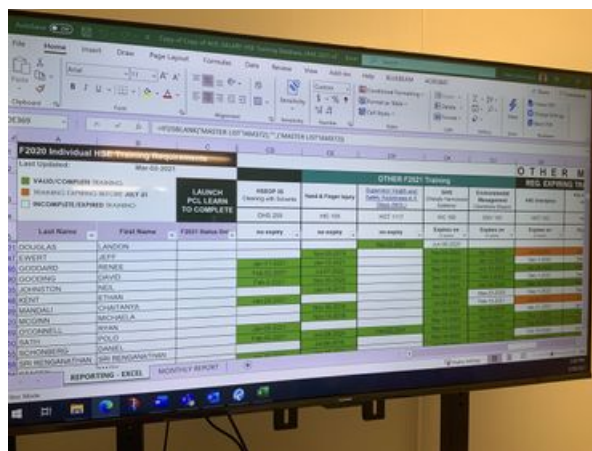


Photo 52

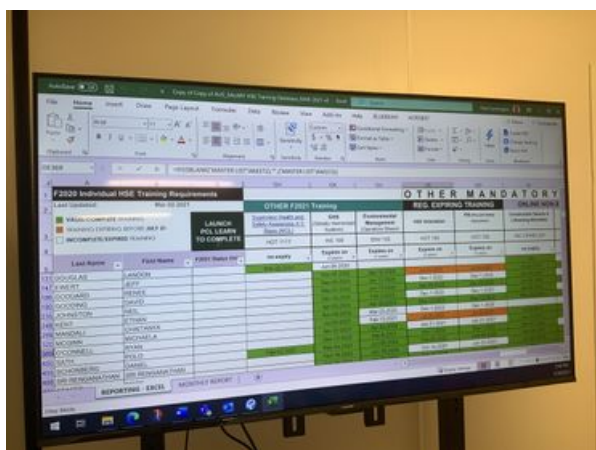


Photo 53

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PUBLICATION DETAILS

Published by Moss Environmental 2021

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