

INDEPENDENT ENVIRONMENTAL AUDIT SEBASTOPOL SOLAR FARM (SSD 9098)

April 2021

Auditee: Beon Energy Solutions (contractor) on behalf of Sebastopol Solar Farm (proponent)

Auditor: Vantage Environmental Management Pty Ltd

Vantage Environmental Management Pty Ltd
Address PO Box 378 Albury NSW 2640
Website www.venv.com.au **Telephone** (02) 6021 8655



This Independent Environmental Audit report has been certified by Toby Hobbs, Principal Auditor (Exemplar Global) and Director of Vantage Environmental Management Pty Ltd.

Report Version	Date	Comments	Prepared by	Approved for issue by
Draft	01 Apr 2021	Draft for review	T. Hobbs S. Price	T. Hobbs
Rev. 1	16 Apr 2021	Minor edits and finalisation	T. Hobbs S. Price	T. Hobbs

LIMITATIONS

This report has been prepared in accordance with NSW Department of Planning, Industry and Environment requirements and guidelines. While all reasonable attempts have been made to ensure the accuracy of the content of this report, Vantage Environmental Management Pty Ltd excludes implied warranties and conditions to the extent legally permissible. The information and assumptions presented within this report, inclusive of evaluation of construction activities and compliance, are based on viewed site conditions and information provided by Beon Energy Solutions, Sebastopol Solar Farm (proponent), their contractors and consultants as well as other stakeholders. Liability arising from any of the assumptions being incorrect is disclaimed and no responsibility will be taken for any damage or loss that may occur through either the use or reliance of the content of this document for purposes other than for which it was prepared. This report should be considered in its entirety and not relied on, released to, or duplicated by third parties in whole or in part without the permission of Beon Energy Solutions, Sebastopol Solar Farm (proponent) and Vantage Environmental Management Pty Ltd.

TABLE OF CONTENTS

1	EXECUTIVE SUMMARY	1
2	INTRODUCTION	3
	2.1 Background	3
	2.2 Audit Team	3
	2.3 Audit Objectives	3
	2.4 Audit Scope	3
	2.5 Audit Period	4
	2.6 Audit Opening and Closing Meetings	4
3	AUDIT METHODOLOGY	5
	3.1 Selection and Endorsement of Audit Team	5
	3.2 Independent Audit scope development	5
	3.3 Compliance Evaluation	5
	3.4 Site Personnel Interviews	6
	3.5 Site Inspections	6
	3.6 Consultation	6
	3.7 Compliance Status Descriptors	8
4	AUDIT FINDINGS	8
	4.1 Approvals and Documents Audited	8
	4.2 Compliance Performance	8
	4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions	9
	4.4 Non-compliances	9
	4.5 Previous Audit Recommendations	9
	4.6 EMP, Sub-plans and compliance documents	10
	4.6.1 Environmental Management Strategy	10
	4.6.2 Work Health Safety and Environment Management Plan for Construction	10
	4.6.3 (Cultural) Heritage Management Plan	10
	4.6.4 Traffic Management Plan	11
	4.6.5 Landscaping Plan	11
	4.6.6 Biodiversity Management Plan	11
	4.7 Environmental Performance	11
	4.8 Complaints	12
	4.9 Incidents	12
	4.10 Actual verses Predicted Environmental Impacts	12
	4.11 Site Inspections	15
	4.12 Site Interviews	15
	4.13 Previous Annual Review or Compliance Report Recommendations	16
	4.14 Key Strengths	16
5	RECOMMENDATIONS	16
	5.1 Non-compliances	16
	5.2 Opportunities for Improvement	17
6	CONCLUSION	17

APPENDICES

Appendix A	Planning Secretary Audit Team Agreement
Appendix B	Consultation
Appendix C	Independent Audit Table
Appendix D	Site Inspection Photographs (25-26 March 2021)
Appendix E	Independent Audit Declaration Form

TABLES

Table 1	Audit Meeting Attendance Register
Table 2	Summary of DPIE comments and report reference
Table 3	Actual verses Predicted Environmental Impacts

1 EXECUTIVE SUMMARY

This report presents the findings of an Independent Environmental Audit (IEA) that was undertaken to assess the environmental performance and compliance status of the Sebastopol Solar Farm (NSW Department of Planning, Industry and Environment [DPIE]: Application Number SSD 9098), herein referred to as the “Project”.

The Audit was undertaken by Vantage Environmental Management Pty Ltd in accordance with the requirements of Schedule 4, Condition 7 of the Project’s Development Consent (Modification 1, July 2020) and conducted in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020). The scope of the audit was developed in consultation with DPIE, NSW Environment Protection Authority, Junee Shire Council and Temora Shire Council and approved via DPIE correspondence of 03 March 2021.

There were three (3) non-compliances identified with Development Consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (SSF-IEA-21-NC1):** Not all Aboriginal heritage items identified in Table 1 of Appendix 4 (and referred to in Schedule 3, Condition 17) of the Development Consent could be identified and recovered at the time of salvage works on 14 and 15 December 2020 as additional site disturbance from non-Project related agricultural activities (crop sowing and harvesting) had occurred between the time the Aboriginal Cultural Heritage Assessment Report (NGH Environmental, November 2018) was prepared, which listed the heritage items, and the commencement of salvage works. It was reported that the proponent was not in possession and/or control of the Project site at the time the cropping activities occurred. Notwithstanding this, it is considered that the proponent should have raised an internal investigation and informed DPIE and other relevant stakeholders that some previously identified heritage items could not be relocated at the time of the salvage program;
- **Non-compliance No. 2 (SSF-IEA-21-NC2):** Section 5.1.2 of the Environmental management Strategy (EMS) was not implemented in accordance with Schedule 4, Condition 1 of the Development consent. Section 5.1.2 of the EMS stated: *“During construction Beon will ensure that sufficient water for firefighting (minimum 20,000 L water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection) is stored in water tanks located on site adjacent to the internal access road”*. It was confirmed that in excess of 20,000L of water that could be used for firefighting was held on site within water carts, however the proposed 20,000L tank would be installed to satisfy operational requirements as detailed in Schedule 3, Condition 25 of the Development Consent.
- **Non-compliance No.3 (SSF-IEA-21-NC3):** Section 7.5 of the EMS was not implemented in accordance with Schedule 4, Condition 1 of the Development Consent as no evidence of the publication of newspaper advertisements and posting of newsletters and project updates on a prominent community noticeboard in Temora and Junee was identified during the audit.

Upon being notified of the above non-compliances during the audit closing meeting of 31 March 2021, Beon and Sebastopol Solar Farm (proponent) committed to notifying DPIE in accordance with the requirements of Schedule 4, Condition 5 of the Development Consent.

Based on the outcomes of the audit program the following recommendations were made:

- **Recommendation No. 1 (SSF-IEA-21-R1):** In response to Non-compliance No. 1 the actions are recommended:
 - a) Advise DPIE and relevant stakeholders of salvage outcomes; and
 - b) Complete required heritage reporting and prepare Aboriginal Site Impact Recording Form (ASIRF), as necessary, for inclusion within the Aboriginal Heritage Information Management System (AHIMS) database;
- **Recommendation No. 2 (SSF-IEA-21-R2):** In response to Non-compliance No. 2, update EMS to confirm tank will be installed for operation, rather than construction, as per Development consent; and

- **Recommendation No. 3 (SSF-IEA-21-R3):** In response to Non-compliance No. 3, prepare and publish required notifications or amend EMS to document only those stakeholder and community and engagement initiatives that can be reasonably and practicably achieved.

In addition to the above noted recommendations, the following continual environmental management improvement opportunities were identified during the audit:

- Section 5.4.2, Table 5-1 and Table 2-2 could be updated in regard to the Fire Safety Study (FSS) to explain that the FSS has not been prepared as battery storage is not being constructed on the Project; and
- Review Project phone contact information, that is presented within the EMS and associated management plans to allow community to obtain Project-related information, to ensure the number is consistent in all relevant documentation.

Overall, the standard of environmental management evident during the completion of the Audit was high. Construction works and associated management plans, records and monitoring documentation were deemed, in the majority, to be generally consistent with Development consent conditions and associated strategies, plans and programs.

House-keeping across the Project site was of an excellent standard and Project personnel were familiar with their environmental compliance responsibilities and obligations.

It is considered that the management strategies in place to mitigate potential construction impacts were generally appropriate and the impacts observed on site were consistent with those identified in the EIS.

There was one (1) complaint (dust generation associated with construction works) and no (0) environmental incidents reported within the Audit period.

Following issue of the draft report associated with the IEA, information was provided by the Project proponent, Sebastopol Solar Farm and their construction contractor, Beon Energy Solutions, to address the Auditor's recommendations associated with the three (3) noted non-compliance matters. Based on review of this information, the Auditor considers these recommendations will be adequately addressed.

In accordance with Section 4.3.2 of the *Independent Audit Post Approval Requirements* (DPIE, 2020), the proponent must submit their response to the audit findings to the Department in a separate document to this report. The proponent must respond to all audit findings, including recommendations and opportunities for improvement.

2 INTRODUCTION

2.1 Background

This report presents the findings of an Independent Environmental Audit (IEA) that was undertaken by Vantage Environmental Management Pty Ltd (Vantage) to assess the environmental performance and compliance status of the Sebastopol Solar Project (NSW Department of Planning, Industry and Environment [DPIE] Application Number: SSD 9098), herein referred to as the “Project”. The IEA is a requirement of Schedule 4, Condition 7 of the Project’s Development Consent (Modification 1, July 2020).

The Project covers an area of approximately 248 hectares and is located approximately 4 kilometres southeast of Sebastopol and approximately 16 kilometres south of Temora. The site is located within the Temora Local Government Area and the southern boundary of the site borders the Junee Local Government Area. Road access to the site is via Eurolee Road, which is located within the Junee Local Government Area.

The solar farm will have a capacity of 90 MW and will connect to an existing 132 kV Essential Energy transmission line which runs west of the site.

Construction commenced with the mobilisation of the main contractor and establishment of temporary facilities on 14 January 2021. The Project proponent is Sebastopol Solar Farm and the contractor responsible for construction of the Project is Beon Energy Solutions (Beon). Sebastopol Solar Farm (proponent) procured the Project development rights from ib vogt GmbH Pty Ltd (the original Applicant for the Development Consent) in March 2020.

2.2 Audit Team

The Vantage audit team consisted of Toby Hobbs as the Principal Auditor and Susannah Price as an assistant Auditor. Endorsement of the audit team was provided by DPIE via the correspondence of 15 February 2021, a copy which is included within Appendix A of this report.

Toby Hobbs, MEnvMgmt, is an Exemplar Global-certified Principal Environmental Auditor and has undertaken significant auditor roles in the capacity of the independent Environmental Representative role on many major (\$500M+) infrastructure projects in southern Australia since 2005.

Susannah Price, MSc, is an Exemplar Global-certified Environmental Auditor and has worked in an auditor support role on many major (\$500M+) infrastructure projects in southern Australia since 2007.

2.3 Audit Objectives

The objective of the IEA was to obtain an independent and objective assessment of the environmental performance and compliance status of the Project in accordance with Schedule 4, Condition 7 of the Project’s Development Consent and the *Independent Audit Post Approval Requirements* (DPIE, 2020). The audit scope, discussed below in section 2.4, provides further detail of the audit objectives.

2.4 Audit Scope

The audit scope consisted of:

1. An assessment of compliance with:
 - a. Development Consent for SSD 9098 as modified (Mod 1, July 2020);
 - b. Post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of the following plans during the construction phase such as:
 - i. Environmental Management Strategy;

- ii. Construction Environmental Management Plan;
 - iii. Heritage Management Plan;
 - iv. Traffic Management Plan;
 - v. Landscaping Plan;
 - vi. Biodiversity Management Plan; and
 - vii. Final Layout Plans.
2. An assessment of the environmental performance of the development, including an assessment of:
 - a. Actual impacts compared to predicted impacts documented in the Environmental Impact Statement and associated amendments;
 - b. The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
 - c. Incidents, non-compliances and complaints that occurred or were made during the audit period;
 - d. The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
 - e. Any feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period.
 3. The status of implementation of previous Independent Audit findings, recommendations and actions (if any);
 4. A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
 5. Any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

Further information regarding relevant matters raised by the Department are discussed within Section 3.6 of this report and have been addressed during completion of the IEA.

2.5 Audit Period

This IEA covers the period of commencement of construction (14 January 2021) to the date of the final site visit on 26 March 2021.

2.6 Audit Opening and Closing Meetings

As part of the IEA program, Audit Opening and Audit Closing meetings were held as noted in Table 1, below.

TABLE 1: Audit Meeting Attendance Register

Meeting Type/ Date of Meeting	Personnel Present
Audit Opening Meeting 11 March 2021	Javier Herrera Torrubia (Sebastopol Solar Farm - Senior Project Manager) Paula Cordeiro (Sebastopol Solar Farm - Project Coordinator) Kirsten Lee (Beon - Compliance, Sustainability and Stakeholder Lead) Toby Hobbs (Vantage Environmental Management - Principal Auditor) Susannah Price (Vantage Environmental Management – Auditor)
Audit Closing Meeting 31 March 2021	Paula Cordeiro (Sebastopol Solar Farm - Project Coordinator) Kirsten Lee (Beon - Compliance, Sustainability and Stakeholder Lead) Gregory Benvenuti (Beon – Senior Project Manager) Melissa Rocchiccioli (Beon - Health, Safety and Environmental Advisor) Toby Hobbs (Vantage Environmental Management - Principal Auditor) Susannah Price (Vantage Environmental Management – Auditor)

3 AUDIT METHODOLOGY

3.1 Selection and Endorsement of Audit Team

The Audit team was selected by the contractor (Beon) on 02 February 2021 and endorsed by DPIE via their correspondence of 15 February 2021, a copy of which is included within Appendix A of this report.

3.2 Independent Audit scope development

Prior to the commencement of the audit, the scope was developed in accordance with Schedule 4, Condition 7 of the Project's Development Consent and the *Independent Audit Post Approval Requirements* (DPIE, 2020). On 17 February 2021, Vantage issued the proposed audit scope to DPIE, Temora Shire Council, Junee Shire Council and NSW Environment Protection Authority (EPA) for comment.

Correspondence received from DPIE on 03 March 2021 confirmed that the Department were generally satisfied with the audit scope/schedule. Additional feedback on the proposed audit scope was provided by DPIE's Team Leader of Compliance on 23 March 2021 and listed within Section 3.6 of this report.

A Temora Shire Council Town Planner/Strategic Projects Officer advised that Council did not have any comments regarding the proposed scope of the audit.

No feedback regarding the scope of the audit was received from Junee Shire Council or EPA.

Copies of correspondence related to consultation undertaken as part of the audit scope are presented within Appendix B of this report.

3.3 Compliance Evaluation

In order to evaluate Project compliance, the following process was followed:

- Desktop audit of the documents provided by the proponent;
- Collection of further information from the proponent as required; and
- Assessment of documents for compliance and reporting in this audit report.

3.4 Site Personnel Interviews

Interviews were held with the following site personnel on 25 and 26 March 2021 as part of the Project site visit for the audit:

- Mark Whitehouse – Beon Project Manager;
- Gregory Benvenuti – Beon Senior Project Manager; and
- Melissa Rocchiccioli – Beon Health, Safety and Environmental Advisor.

The site interviews provided the Auditor with an opportunity to obtain relevant evidence regarding the compliance status and environmental performance of the Project to support the desk-based audit review process. It is noted that site personnel interviewed were most willing to assist the Auditor and provided full and prompt disclosure with respect to the Auditor's queries.

3.5 Site Inspections

Site inspections were undertaken by Toby Hobbs on 25 and 26 March 2021. The purpose of the site visits was to discuss the compliance status of the Project with relevant site personnel, view environmental management records, view the status of on-site environmental controls and observe general environmental performance and Development Consent (and associated management plans and strategies) compliance for the Project.

The site visits also provided the Auditor with an opportunity to obtain appropriate evidence regarding the compliance status and environmental performance of the Project to support the desk-based audit review process. It is noted that all areas of the site were accessible to the Auditor at the time of the site visits.

3.6 Consultation

Consultation associated with completion of this Audit involved issue of the proposed audit scope to DPIE, Temora Shire Council, Junee Shire Council and NSW Environment Protection Authority (EPA) for comment on 17 February 2021. A request for feedback on the environmental performance of the project was also issued to the above-referenced stakeholders by Vantage on 16 March 2021.

In addition, interviews, an audit opening meeting and an audit closing meeting were held with Project personnel including:

- Javier Herrera Torrubia (Sebastopol Solar Farm - Senior Project Manager);
- Paula Cordeiro (Sebastopol Solar Farm - Project Coordinator);
- Kirsten Lee (Beon - Compliance, Sustainability and Stakeholder Lead);
- Mark Whitehouse – Beon Project Manager;
- Gregory Benvenuti – Beon Senior Project Manager; and
- Melissa Rocchiccioli – Beon Health, Safety and Environmental Advisor.

Feedback on the proposed audit scope is discussed within Section 3.2 of this report.

Additional feedback regarding the audit scope was received by DPIE's Team Leader of Compliance and listed within Table 2, below, along with a reference to where each item is discussed in this audit report. In addition, DPIE stated that they had not received any complaints regarding the Project to the date of their correspondence (23 March 2021).

TABLE 2: Summary of DPIE comments and report reference

DPIE comment	Section of this report discussing the comment
Road upgrades (completed to the roads authority satisfaction)	Section 4.2: Environmental Performance Appendix A: Audit Table
Management and tracking of both heavy and light vehicles to and from site	Section 4.2: Environmental Performance Appendix A: Audit Table
Management of any material (dirt, gravel, etc) being transported off site (tracking at entry and exit points)	Section 4.2: Environmental Performance Appendix A: Audit Table
Management plans approved and implemented	Section 4.2: Environmental Performance Appendix A: Audit Table
Appropriate other certificates obtained (such as construction certificates)	Section 4.2: Compliance Performance Appendix A: Audit Table
Vegetation and heritage sites fenced off (and/or salvaged) and managed in accordance with management plans	Section 4.2: Compliance Performance Appendix A: Audit Table Appendix D: Site Inspection Photographs
Erosion and sediment controls in place and maintained	Section 4.7: Environmental Performance
Water management on and off site (ensuring measures are in place to minimise off site impacts such as sedimentation/flooding, etc)	Section 4.2: Compliance Performance Section 4.7: Environmental Performance Section 4.10: Actual verses Predicted Environmental Impacts Appendix D: Site Inspection Photographs
Waste management	Section 4.2: Compliance Performance Section 4.7: Environmental Performance Appendix D: Site Inspection Photographs
Community consultation and management of complaints register	Section 4.2: Compliance Performance Section 4.8: Complaints

A Temora Shire Council Town Planner/Strategic Projects Officer advised that the only environmental issue Council knew of was that some concerns regarding the safety of vehicles approaching Eurolee Road intersection had been raised by the construction contractor, Beon. The auditor discussed this concern with a Transport for NSW (TfNSW) Manager (Land Use) who had liaised with Beon personnel regarding the issue. TfNSW confirmed that following review, “Trucks Turning” signage would be installed at the approach to the intersection.

Junee Shire Council did not provide any feedback on the environmental performance of the Project. As mentioned previously, only the road access to the site via Eurolee Road is located within the Junee Local Government Area.

EPA did not provide any feedback on the environmental performance of the Project. It is understood that the Project is not likely to constitute a “Scheduled” activity under the Protection of the Environment Operations Act 1997. As such, and given the Project is not being conducted by a public authority, the EPA is likely not the Appropriate Regulatory Authority (ARA) but instead, Temora Shire Council would be.

Copies of correspondence related to consultation undertaken as part of the audit program are presented within Appendix B of this report.

3.7 Compliance Status Descriptors

The compliance status of each Development Consent condition in the Audit Table in Appendix A has been determined in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020). The compliance status was recorded as one of the following:

- 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; or
- Not triggered – A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

4 AUDIT FINDINGS

4.1 Approvals and Documents Audited

The following construction-related approvals and documents were considered as part of this IEA:

- Development Consent for SSD 9098 as modified (Modification 1 – July 2020);
- Environmental Management Strategy;
- Work Health Safety and Environmental Management Plan for Construction;
- (Cultural) Heritage Management Plan;
- Traffic Management Plan;
- Landscaping Plan;
- Biodiversity Management Plan;
- Final Layout Plans;
- Soil and Water Management Plans; and
- Community and Stakeholder Engagement Plan.

A Fire Safety Study, as required under Schedule 3, Condition 23 of the Development Consent, has not been prepared as the battery storage facility is not going to be constructed. This issue is discussed further in Section 4.6.1 of this report.

It is noted that a draft version of the Fire Management and Emergency Response Plan (FMERP), as required prior to commissioning the development (Schedule 3, Condition 26 of the Development Consent), has been prepared by NGH Environmental and is currently being reviewed by NSW Rural Fire Service and Fire and Rescue.

4.2 Compliance Performance

There are a total of 47 conditions within the Development Consent of the Project as modified (Modification 1, July 2020) and all 47 conditions were assessed for environmental compliance as part of this IEA. It is noted that one (1) condition (Schedule 4, Condition 6 – Compliance Reporting) was deleted and therefore not considered. 31 conditions were determined to be compliant, two (2) were determined to be non-compliant and 14 were not triggered as part of this IEA. Detailed audit outcomes are presented within Appendix C (Audit Table of Development Consent Conditions). In accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020) the audit table presents the following information:

- Development Consent condition (Approval ID);
- Development Consent requirements;
- Audit evidence collected;
- Audit findings and recommendations; and
- Compliance status.

4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

As far as the auditor of this report is aware, no agency notices, order, penalty notices or prosecutions have been issued for the Project.

4.4 Non-compliances

There were three (3) non-compliances identified with Development consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (SSF-IEA-21-NC1):** Not all Aboriginal heritage items identified in Table 1 of Appendix 4 (and referred to in Schedule 3, Condition 17) of the Development Consent could be identified and recovered at the time of salvage works on 14 and 15 December 2020 as additional site disturbance from non-Project related agricultural activities (crop sowing and harvesting) had occurred between the time the Aboriginal Cultural Heritage Assessment Report (NGH Environmental, November 2018) was prepared, which listed the heritage items, and the commencement of salvage works. It was reported that the proponent was not in possession and/or control of the Project site at the time the cropping activities occurred. Notwithstanding this, it is considered that the proponent should have raised an internal investigation and informed DPIE and other relevant stakeholders that some previously identified heritage items could not be relocated at the time of the salvage program;
- **Non-compliance No. 2 (SSF-IEA-21-NC2):** Section 5.1.2 of the Environmental management Strategy (EMS) was not implemented in accordance with Schedule 4, Condition 1 of the Development consent. Section 5.1.2 of the EMS stated: *"During construction Beon will ensure that sufficient water for firefighting (minimum 20,000 L water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection) is stored in water tanks located on site adjacent to the internal access road"*. It was confirmed that in excess of 20,000L of water that could be used for firefighting was held on site within water carts, however the proposed 20,000L tank would be installed to satisfy operational requirements as detailed in Schedule 3, Condition 25 of the Development Consent; and
- **Non-compliance No.3 (SSF-IEA-21-NC3):** Section 7.5 of the EMS was not implemented in accordance with Schedule 4, Condition 1 of the Development Consent as no evidence of the publication of newspaper advertisements and posting of newsletters and project updates on a prominent community noticeboard in Temora and Junee was identified during the audit.

Upon being notified of the above non-compliances during the audit closing meeting of 31 March 2021, Beon and Sebastopol Solar Farm (proponent) committed to notifying DPIE in accordance with the requirements of Schedule 4, Condition 5 of the Development Consent.

4.5 Previous Audit Recommendations

There have not been any previous environmental audits undertaken for the Project.

4.6 EMP, Sub-plans and compliance documents

The Development Consent stipulates that specific post approval documents be prepared and submitted to the Department prior to the commencement of construction. As part of this audit, the following post approval documents have been assessed to determine if they have been developed and implemented in accordance with the conditions of consent and their content is adequate:

- Environmental Management Strategy;
- Work Health Safety and Environment Management Plan for Construction;
- (Cultural) Heritage Management Plan;
- Traffic Management Plan;
- Landscaping Plan; and
- Biodiversity Management Plan.

The adequacy of the documents was determined on the basis of whether there were any non-compliances resulting from the implementation of the document or whether there were any opportunities for improvement. A technical review of the documents was not undertaken as part of this audit.

4.6.1 Environmental Management Strategy

The Environmental Management Strategy was prepared by NGH Environmental and the most recent version viewed as part of this audit was Revision “Final V1.1” dated 22 December 2020. The EMS was approved by the Department on 23 December 2020, prior to commencement of construction.

The auditor considers the EMS has been generally developed in accordance with the conditions of consent and approvals and that the content is generally adequate. There do, however, appear to be some opportunities for improvement to ensure continual environmental management performance and compliance with the Development consent which are discussed within Section 5.2 (Opportunities for Improvement) of this report.

Given the requirement in Section 7.3 of the EMS for completion of a Management Review of the EMS (and Project EMPs) at least once during the construction phase, the auditor recommends undertaking this review in the near future and incorporating the recommendations listed within Section 5.1 and opportunities for improvement listed within Section 5.2.

Further information regarding the EMS is discussed in the Independent Audit Table in Appendix C.

4.6.2 Work Health Safety and Environment Management Plan for Construction

The Work Health Safety and Environment Management Plan (WHSEMP) was prepared by Beon and the most recent version viewed as part of this audit was Revision No. 1.0 dated 19 February 2021. The WHSEMP did not require approval by DPIE but it is noted that it was reviewed by Sebastopol Solar Farm (proponent) and updated based on their comments.

The auditor considers the WHSEMP has been generally developed in accordance with the EMS and the Development Consent and that the content is generally adequate and being implemented on site.

4.6.3 (Cultural) Heritage Management Plan

The Heritage Management Plan (named Cultural Heritage Management Plan [CHMP]) was prepared by NGH Environmental and the most recent version viewed as part of this audit was Revision “Final 1.6” dated 16 September 2020. The CHMP was approved by DPIE on 17 September 2020, prior to commencement of construction.

The auditor considers the CHMP has been generally developed in accordance with the conditions of consent and approvals and that the content is generally adequate and being implemented on site. It is noted that the authors of the report were endorsed by the Secretary as heritage experts and that the CHMP was prepared in consultation with DPIE's Biodiversity and Conservation Division (BCD) and Aboriginal Stakeholders.

Further information regarding the CHMP is discussed in the Independent Audit Table in Appendix C.

4.6.4 Traffic Management Plan

The Traffic Management Plan was prepared by NGH Environmental and the most recent version viewed as part of this audit was Revision "Final V1.0" dated 24 November 2021. The TMP was approved by DPIE on 14 December 2020, prior to commencement of construction.

The TMP was developed in consultation with Transport for NSW (TfNSW) and Council as discussed in Section 3 of the TMP.

The auditor considers the TMP has been generally developed in accordance with the conditions of consent and approvals and that the content is generally adequate and being implemented on site. Further information regarding the TMP is discussed in the Independent Audit Table in Appendix C.

4.6.5 Landscaping Plan

The Landscaping Plan (LP) was prepared by NGH Environmental and the most recent version viewed as part of this audit was Revision Final V1.4 dated 22 January 2021. An earlier version of the LP (Revision 1.3 dated 22 December 2020) was approved by DPIE on 24 December 2020, prior to commencement of construction.

The LP was developed in consultation with Council as discussed in Section 4 of the LP.

The auditor considers the LP has been generally developed in accordance with the conditions of consent and approvals and that the content is generally adequate and being implemented on site.

Further information regarding the LP is discussed in the Independent Audit Table in Appendix C.

4.6.6 Biodiversity Management Plan

The Biodiversity Management Plan (BMP) was prepared by NGH Environmental and the most recent version viewed as part of this audit was Revision "Final V1.0" dated 04 December 2020. The BMP was approved by DPIE on 21 December 2020, prior to commencement of construction.

The BMP was developed in consultation with BCD as discussed in Section 1.6 of the BMP.

The auditor considers the BMP has been developed in accordance with the conditions of consent and approvals and that the content is generally adequate and being implemented on site.

Further information regarding the BMP is discussed in the Independent Audit Table in Appendix C.

4.7 Environmental Performance

Based on the review activities undertaken during the current audit program, it is considered that the mitigation measures detailed in the DPIE-approved Environmental Management Strategy, as well as other strategies, plans and programs required within the Development Consent were generally appropriate and effective in minimising impacts associated with construction of the Project.

Following completion of the Auditor's interviews and site visit of 25-26 March 2021, it was deemed that a good range of appropriately implemented environmental controls were in place to assist in minimising the risk of significant environmental incidents such as damage to heritage items, native vegetation and pollution events. Key environmental protection measures observed during the site visits included:

- Environmental controls such as sediment fencing and water quality basins to assist in the management of potential erosion and/or sedimentation;
- Posting of speed limits and signage in accordance with the Traffic Management Plan;
- Tracking and documentation of heavy vehicle and over-dimensional movements;
- Tracking and documentation of plant and equipment maintenance;
- Provision of well stocked spill kits at key locations across the Project site;
- Use of watercarts and progressive stabilisation to minimise potential dust generation;
- Signage and exclusion zone fencing for protection of heritage areas;
- Implementation of a weekly environmental monitoring system as documented within Environmental Inspection Checklists;
- Storage of fuels and chemicals within suitably labelled and bunded enclosures;
- Structured management of waste and recyclable materials; and
- Implementation of a high standard of house-keeping.

4.8 Complaints

As of 26 March 2021, it was reported that there had been one (1) complaint related to environmental management matters during construction. The complaint was received from a local resident who contacted Council to complain about dust being generated at the Project site. It was reported that a Council representative visited the Project site and noted that, while some dust generation was evident, it was consistent with that being generated by activities on neighbouring properties. In response to the complaint, Beon informed the Council representative that five (5) water suppression trucks were in use on the site to assist with air quality management. Weather conditions were also monitored to ensure that work activities would be modified, as necessary, during periods of high wind. The auditor considers that the response to this complaint was satisfactory and mitigation measures are in place to minimise dust generation from construction works.

It is noted that the Project website (<http://sebastopolsolarfarm.com/>) contains information to encourage members of the community to share their thoughts, concerns or suggestions for the Project via an email enquiry form. In addition, the website contains a link to the required Complaints Register and the complaint referred to above is documented within the Register.

4.9 Incidents

No incidents were reported to have occurred during the period from commencement of construction on 14 January 2021 to the date of the Auditor's final site visit associated with this IEA on 26 March 2021.

4.10 Actual versus Predicted Environmental Impacts

A detailed investigation of risks and potential impacts associated with the Project was undertaken in the Project EIS and the following environmental aspects were identified as key risks:

- Biodiversity (flora and fauna);
- Aboriginal cultural heritage;
- Visual impact;
- Land use and resources; and

- Noise impacts.

As part of this audit, specific potential impacts listed in the EIS within each of the environmental aspects were considered and comment provided on the actual impacts during construction (see Table 3, below). Comment is not provided regarding potential operational impacts as the Project was under construction at the time of the audit and, therefore, an assessment of operational phase impact management was beyond the scope of the audit.

It is considered that the management strategies in place to mitigate potential construction impacts were appropriate and the impacts observed on site were generally consistent with those identified in the EIS, apart from those associated with the salvage of some Aboriginal heritage items that could not be located due to prior, non-construction related land disturbance. Table 3, below, presents a summary of audit observations associated with above-noted potential impacts.

TABLE 3: Actual verses Predicted Environmental Impacts

Predicted Potential Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
BIODIVERSITY		
Habitat clearance for permanent and temporary construction facilities	Clearing was completed in accordance with approved designs and flora/fauna protection measures.	Environmental protection measures in place as per the DPIE-approved Biodiversity Management Plan (BMP). Preparations for vegetative screen plantings has commenced. Clearing minimised to greatest extent practicable.
Displacement (or injury or death) of resident fauna	Clearing conducted in accordance with BMP. One (1) fauna item recovered by ecologists and transferred to care of WIRES.	Environmental protection measures in place as per the DPIE-approved BMP. Two (2) ecologists present during tree clearing. Coarse woody debris retained.
Removal of habitat features, e.g. hollow-bearing trees	Clearing minimised as much as possible. Vegetation fencing and exclusion zones in place. Boundary fencing in place.	Cleared vegetation has been retained for future habitat enhancement (coarse woody debris).
Shading and microclimate effects of solar infrastructure	N/A	Only relevant during operation phase
Existence of permanent solar infrastructure	N/A	Only relevant during operation phase
ABORIGINAL CULTURAL HERITAGE		
Removal, breakage or displacement of artefacts during construction	Project Archaeologist completed salvage in December 2020. Not all previously identified heritage items within construction footprint could be located due to disturbance from prior agricultural activities.	Heritage exclusion zone fencing and signage is in place for on-site items and boundary fencing is in place to protect off-site items. Salvaged items have been catalogued and are held with a cultural heritage consultant in Wagga Wagga. Return of Rights is pending and a site visit and training day with Registered Aboriginal Parties is scheduled for 08 April 2021. At that time, proposed artifact reburial locations will be

Predicted Potential Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
		presented for discussion and approval by relevant parties. Weekly environmental inspection checklists document that heritage sites protection is in place.
VISUAL IMPACT		
Low to medium visual impact of solar farm and associated infrastructure by local receivers	Visual impacts associated with the Project were limited at the time of the audit as only a small portion of Project infrastructure was complete. The Project site is in a rural area and not visible from the closest major road (Goldfields Way).	Vegetation screen planting will be completed as part of the project to minimise visual impacts, in accordance with the Landscaping Plan.
On site infrastructure finished in bright colours and/or reflective surfaces	No permanent buildings were complete at the time of the audit. Temporary facilities associated with the site compound were present and set-back from Eurolee Road to minimise visual impact.	Project designs incorporate a subdued colour palate for permanent infrastructure that is consistent with the surrounding rural setting. Non-reflective materials will be used where possible/practicable to minimise glare and reflections.
Construction night lighting providing nuisance to neighbours or hazardous to drivers	No permanent lighting in place at time of the audit.	Project designs incorporate the use of sensors and shielding of lights to minimise potential light-spill and glare issues.
LAND USE IMPACTS		
Agricultural activities on the land would cease in the areas involved in access and construction	The land upon which the solar farm was observed to be unavailable for agricultural cropping at the time of the site visit. Environmental protection measures were noted to be in place to minimise potential impacts on adjoining agricultural land.	Strategies in place to ensure appropriate rehabilitation and maximise future agricultural use, where and when possible. Infrastructure is considered to be "low impact" and unlikely to result in land degradation once construction phase is complete.
Disruption to local traffic during construction	No local traffic was observed on Eurolee Road at the time of the audit as the Project site is located within sparsely populated rural lands. Agreed improvements have been made to the intersection of Eurolee Road and Goldfields	Construction traffic deemed to be managed in accordance with the DPIE-approved Traffic Management Plan. Heavy and over-dimensional vehicle movement registers were reviewed by the Auditor and volumes were confirmed to be compliant with Development consent conditions. Car-pooling and mini-buses are in use to reduce

Predicted Potential Impacts (as documented in EIS)	Actual Impacts (as observed during audit)	Comments
	Way. Approximately 400m of Eurolee Road has been sealed.	potential impacts associated with increased traffic during construction phase.
Biosecurity risk, i.e. pests, diseases and weeds due to increase movement of vehicles on site	No significant weed and/or pest infestations associated with construction were observed on the Project site at the time of the audit.	Plant/equipment inductions are conducted that incorporate inspections for the presence of biosecurity risks. The site is monitored for presence of weeds.
NOISE IMPACTS		
Construction and operation noise	No significant and/or un-predicted noise impacts were noted at the Project site during the Auditor's site visit of 25 and 26 March 2021. No complaints related to noise have been received.	Periodic maintenance of plant and equipment was confirmed to have been conducted to ensure optimal operating performance. Reduced speed limits were observed to be in place to assist in limiting noise from moving plant/equipment.
Road traffic noise	Reduced speed limits noted to be in place within Project site to assist in minimising potential noise. Heavy vehicle movement register confirmed that traffic volume was less than allowable maximums.	Traffic Management Plan requirements are being adhered to. Over-dimensional and heavy vehicles restrictions are adhered to and monitoring conducted and documented within the vehicle register.

4.11 Site Inspections

Site inspections were undertaken by Toby Hobbs on 25 and 26 March 2021. The site was noted to be currently under construction with a range of activities occurring including earthworks, piling, panel installation and commissioning trials. The weather on both days of the site visit was clear and approximately 22°C. It is noted that there had been a significant weather event resulting in over 100mm of rainfall between 21 and 23 March 2021 (Temora Bureau of Meteorology monitoring station), just prior to the site visit. It is noted that all areas of the site were accessible to the auditor at the time of the site visits.

Evidence for the audit collected during the site inspections is presented within the column titled "Evidence Collected" in the Independent Audit Table (Appendix C). In addition, site inspection photographs are presented within Appendix D.

4.12 Site Interviews

As mentioned previously, interviews were held with the following senior Project personnel on 25 and 26 March 2021 as part of the site visits for the audit:

- Mark Whitehouse – Beon Project Manager;
- Gregory Benvenuti – Beon Senior Project Manager; and

- Melissa Rocchiccioli – Beon Health, Safety and Environmental Advisor.

Evidence for the audit collected during the site interviews is presented within the column titled “Evidence Collected” in the Independent Audit Table (Appendix C).

4.13 Previous Annual Review or Compliance Report Recommendations

There have not been any annual reviews or compliance reporting undertaken for this Project.

4.14 Key Strengths

The standard of environmental management evident during completion of the Independent Environmental Audit was high with several key strengths evident as noted below:

- General housekeeping across the Project site was of a very high standard with a strong focus on sorting and segregation of materials for reuse and recycling;
- Site disturbance was minimised where possible to ensure groundcover remained in place to prevent potential erosion and/or sedimentation during construction;
- The standard of record keeping associated with environmental monitoring was excellent. All reviewed on-site Environmental Inspection Checklists, registers and records were clear, concise and accurately filled in;
- Project personnel, inclusive of those from the proponent and contractor teams, were well resourced, suitably qualified, dedicated, and experienced. There was a strong commitment evident to best practice environmental management outcomes and Development consent compliance; and
- A good level of community and stakeholder management is occurring, and it was apparent that there was a good rapport between the Project team and adjoining landowners.

5 RECOMMENDATIONS

5.1 Non-compliances

There were three (3) non-compliances identified with Development consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

- **Non-compliance No. 1 (SSF-IEA-21-NC1):** Not all Aboriginal heritage items identified in Table 1 of Appendix 4 (and referred to in Schedule 3, Condition 17) of the Development Consent could be identified and recovered at the time of salvage works on 14 and 15 December 2020 as additional site disturbance from non-Project related agricultural activities (crop sowing and harvesting) had occurred between the time the Aboriginal Cultural Heritage Assessment Report (NGH Environmental, November 2018) was prepared, which listed the heritage items, and the commencement of salvage works. It was reported that the proponent was not in possession and/or control of the Project site at the time the cropping activities occurred. Notwithstanding this, it is considered that the proponent should have raised an internal investigation and informed DPIE and other relevant stakeholders that some previously identified heritage items could not be relocated at the time of the salvage program;
- **Non-compliance No. 2 (SSF-IEA-21-NC2):** Section 5.1.2 of the Environmental management Strategy (EMS) was not implemented in accordance with Schedule 4, Condition 1 of the Development consent. Section 5.1.2 of the EMS stated: *“During construction Beon will ensure that sufficient water for firefighting (minimum 20,000 L water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection) is stored in water tanks located on site adjacent to the internal access road”*. It was confirmed that in excess of 20,000L of water that could be used for firefighting was held

on site within water carts, however the proposed 20,000L tank would be installed to satisfy operational requirements as detailed in Schedule 3, Condition 25 of the Development Consent.

- **Non-compliance No.3 (SSF-IEA-21-NC3):** Section 7.5 of the EMS was not implemented in accordance with Schedule 4, Condition 1 of the Development Consent as no evidence of the publication of newspaper advertisements and posting of newsletters and project updates on a prominent community noticeboard in Temora and Junee was identified during the audit.

Upon being notified of the above non-compliances, Beon and Sebastopol Solar Farm (proponent) committed to notifying DPIE in accordance with the requirements of Schedule 4, Condition 5 of the Development Consent.

Based on the identified non-compliance issues identified during the audit program the following recommendations are made:

- **Recommendation No. 1 (SSF-IEA-21-R1):** In response to Non-compliance No. 1 the actions are recommended:
 - a) Advise DPIE and relevant stakeholders of salvage outcomes; and
 - b) Complete required heritage reporting and prepare Aboriginal Site Impact Recording Form (ASIRF), as necessary, for inclusion within the Aboriginal Heritage Information Management System (AHIMS) database;
- **Recommendation No. 2 (SSF-IEA-21-R2):** In response to Non-compliance No. 2, update EMS to confirm tank will be installed for operation, rather than construction, as per Development consent; and
- **Recommendation No. 3 (SSF-IEA-21-R3):** In response to Non-compliance No. 3, prepare and publish required notifications or amend EMS to document only those stakeholder and community and engagement initiatives that can be reasonably and practicably achieved.

In accordance with Section 4.3.2 of the *Independent Audit Post Approval Requirements* (DPIE, 2020), the proponent must submit their response to the audit findings to the Department in a separate document to this report. The proponent must respond to all audit findings, including recommendations and opportunities for improvement.

5.2 Opportunities for Improvement

Based on the outcomes of the IEA the following continual environmental management improvement opportunities were identified:

- Table 5-1 and Section 5.4.2 of the EMS could be updated in regard to the Fire Safety Study to explain that it has not been prepared as battery storage is not being constructed on the Project; and
- Project phone contact information that is presented within the EMS and associated management plans to allow community to obtain project-related information should be reviewed to ensure the number is consistent in all relevant documentation.

Upon being notified of the above non-compliances during the audit closing meeting of 31 March 2021, Beon and Sebastopol Solar Farm (proponent) committed to notifying DPIE in accordance with the requirements of Schedule 4, Condition 5 of the Development Consent.

6 CONCLUSION

Vantage Environmental Management Pty Ltd has conducted an Independent Environmental Audit (IEA) to assess the environmental performance and compliance status of the Sebastopol Solar Project (NSW Department of Planning, Industry and Environment Application Number SSD 9098). The IEA was a requirement of Schedule 4, Condition 7 of the Project's Development Consent (Modification 1, July 2020) and conducted in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020).

There were three (3) non-compliances identified with Development Consent conditions and the associated management plans and strategies reviewed during the audit program. Recommendations to address the identified non-compliance have been presented by the Auditor. In addition, some revision and update of the project Environmental Management Strategy was identified as a continual environmental management improvement opportunity.

Upon being notified of the above non-compliances during the audit closing meeting of 31 March 2021, Beon and Sebastopol Solar Farm (proponent) committed to notifying DPIE in accordance with the requirements of Schedule 4, Condition 5 of the Development Consent.

It is noted that Schedule 4, Condition 2 of the Development Consent requires that any reviews to strategies, plans or programs required under the Consent be undertaken to the satisfaction of the Secretary within 1 month of the submission of this audit report.

Overall, the standard of environmental management evident during the completion of the audit was high. Construction works and associated management plans, records and monitoring documentation were deemed, in the majority, to be generally consistent with Development Consent conditions and associated strategies, plans and programs.

It is considered that the management strategies in place to mitigate potential construction impacts were appropriate and the impacts observed on site were generally consistent with those identified in the EIS.

Following issue of the draft report associated with the IEA, information was provided by the Project proponent, Sebastopol Solar Farm and their construction contractor, Beon Energy Solutions, to address the Auditor's recommendations associated with the three (3) noted non-compliance matters. Based on review of this information, the Auditor considers these recommendations will be adequately addressed.

In accordance with Section 4.3.2 of the *Independent Audit Post Approval Requirements* (DPIE, 2020), the proponent must submit their response to the audit findings to the Department in a separate document to this report. The proponent must respond to all audit findings, including recommendations and opportunities for improvement.

Appendix A

DPIE Audit Team Endorsement: 15 February 2021



Ms Paula Cordeiro
Project Coordinator FRV
Level 22
6 O'Connell Street
Sydney New South Wales 2000

15/02/2021

Dear Ms Cordeiro

**Sebastopol Solar SSD 9098
Independent Environmental Audit Team approval**

I refer to your request (SSD-9098-PA-11) for the Secretary's approval of suitably qualified persons to prepare the Independent Environmental Audit (audit) for the Sebastopol Solar SSD-9098 (the Consent).

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, in accordance with Schedule 4 Condition 7 of the Consent and the Independent Audit Post Approval Requirements, I can advise that the Secretary approves the appointment of Mr Tony Hobbs (Lead Auditor) and Ms Susannah Price (Auditor) of Vantage Environmental Management Pty Ltd to prepare the audit.

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. 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.

Within 3 months of commencing the audit, or as otherwise agreed by the Secretary, FRV is to submit a copy of the audit report to the Secretary together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that FRV review the report to ensure it complies with the relevant consent condition.

If you wish to discuss the matter further, please contact myself on 0429400261 or at katrina.oreilly@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. O'Reilly', enclosed within a thin black rectangular border.

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

Appendix B

Consultation

Ms Paula Cordeiro
Project Coordinator
FRV
Level 22 6 O'Connell Street
Sydney NSW 2000

03/03/2021

Dear Ms Cordeiro

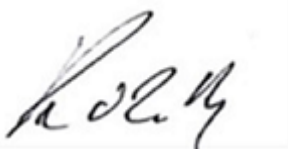
**Sebastopol Solar - Audit Scope 2021 (SSD-9098)
Independent Environmental Audit Schedule**

Reference is made to the Independent Environmental Audit (IEA) schedule, (SSD-9098-PA-12), prepared by Vantage Environmental Management, submitted on 18 February 2020 to the Department of Planning, Industry and Environment (the Department) for the Sebastopol Solar as required by Schedule 4 Condition 7 of SSD 9098 as modified (the consent).

The Department considers that the IEA schedule generally satisfies the requirements of the consent.

If you wish to discuss the matter further, please contact myself on 0429400261 or at katrina.oreilly@planning.nsw.gov.au

Yours sincerely



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

From: [Katrina O'Reilly](#)
To: [Toby Hobbs](#)
Subject: RE: Sebastopol Solar Farm: SSD No. 9098
Date: Tuesday, 23 March 2021 12:08:54 PM

Good afternoon Toby,

Further to our discussion and your below email. The Department would like areas checked such as:

- Road upgrades (completed to the roads authority satisfaction);
- Management and tracking of both heavy and light vehicles to and from site;
- Management of any material (dirt, gravel etc) being transported off site (tracking at entry and exit points);
- Management plans approved and implemented;
- Appropriate other certificates obtained (such as construction certificates);
- Vegetation and heritage sites fenced off (and or salvaged) and managed in accordance with management plans;
- Erosion and sediment controls in place and maintained;
- Water management on and off site (ensuring measures are in place to minimise off site impacts such as sedimentation/flooding etc);
- Waste management; and
- Community consultation and management of complaints register.

To date the Department has not received any complaints in regards to this site.

Regards
Katrina

Katrina O'Reilly
Team Leader Compliance

Energy, Industry & Compliance | Planning and Assessment
T 02 6229 7909 | **M** 0429 400261 | **E** katrina.oreilly@planning.nsw.gov.au
PO Box 5475 | Level 1 11 Farrer Place Queanbeyan NSW 2620
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

From: Toby Hobbs [mailto:thobbs@venv.com.au]
Sent: Tuesday, 16 March 2021 1:18 PM

To: Katrina O'Reilly <Katrina.OReilly@planning.nsw.gov.au>

Subject: Sebastopol Solar Farm: SSD No. 9098

Good afternoon Katrina,

Thanks for taking the time on the 5th of March to discuss the Department's expectation regarding the forthcoming Independent Environmental Audit for the Sebastopol Solar Farm project.

I just wanted to follow up with you to see if DPIE would be issuing any formal correspondence regarding the consultation and also request if the Department wishes to raise any concerns with the environmental performance of the construction of the project.

Finally, would you or one of your team be able to provide me with a summary of complaints, if any, that the Department has received related to the project?

Regards,

Toby

TOBY HOBBS

Principal

Vantage Environmental Management Pty Ltd

PO Box 378 Albury NSW 2640

T (02) 6021 8655 **M** 0420 922 955

www.venv.com.au

 This email is intended for the addressee named and may contain confidential information. If you are not the intended recipient, please delete it and notify the sender.

 Please consider the environment before printing this e-mail

From: [Claire Golder](#)
To: [Susannah Price](#)
Subject: RE: Proposed Audit Scope - Sebastopol Solar Project
Date: Tuesday, 16 March 2021 12:41:42 PM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)

Hi Susannah,

I have received advice from Mr Alex Dahlenburg, Council's Engineering Works Manager, that there have been some concerns raised by the applicant regarding the safety of vehicles approaching Eurolee Rd intersection, with the volume of traffic using that intersection during the construction phase. The applicant is working to Transport for NSW to improve safety at this intersection.

This is the only environmental issue that I am aware of so far.

Thanks
Claire



Claire Golder

Town Planner/Strategic Projects Officer
Temora Shire Council

p: 02 6980 1108

a: 105 Loftus Street (PO Box 262) Temora NSW 2666

w: www.temora.nsw.gov.au e: cgolder@temora.nsw.gov.au



CONFIDENTIALITY NOTICE

The information contained in this email is strictly confidential and prepared solely for the use of the intended recipient(s). The copyright of this communication belongs to the Temora Shire Council.

If you are not the intended recipient, please do not read, use, disseminate, distribute or copy this message or attachments. If you have received this message in error, please notify the sender immediately and delete this message.

Views expressed in this message are those of the individual sender, and are not necessarily the views of the Temora Shire Council.

DISCLAIMER

Before opening any attachments, please check them for viruses and defects. The sender does not accept liability for any viruses, errors or omissions in the contents of this message or Attachment, which arise as a result of email transmission.

From: Susannah Price <sprice@venv.com.au>
Sent: Tuesday, 16 March 2021 11:20 AM
To: Claire Golder <cgolder@temora.nsw.gov.au>
Subject: RE: Proposed Audit Scope - Sebastopol Solar Project

Hi Claire,

Further to my previous email, we are now seeking input from Council as to whether you have any concerns with the environmental performance of the construction of the Sebastopol Solar Farm project or have received any complaints during construction.

Thanks very much for your time.

Regards
Susannah

SUSANNAH PRICE, MSc
Project Manager

Vantage Environmental Management Pty Ltd
PO Box 378 Albury NSW 2640
T (02) 6021 8655 M 0421 871 433
www.venv.com.au

🔄 This email is intended for the addressee named and may contain confidential information. If you are not the intended recipient, please delete it and notify the sender.

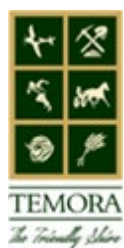
🌱 Please consider the environment before printing this e-mail

From: Claire Golder <cgolder@temora.nsw.gov.au>
Sent: Monday, 22 February 2021 10:41 AM
To: Susannah Price <sprice@venv.com.au>
Subject: RE: Proposed Audit Scope - Sebastopol Solar Project

Hi Susannah,

I advise that Temora Shire Council has no comments to provide on the proposed scope of the Environmental Audit.

Regards,
Claire



Claire Golder
Town Planner/Strategic Projects Officer
Temora Shire Council
p: 02 6980 1108
a: 105 Loftus Street (PO Box 262) Temora NSW 2666
w: www.temora.nsw.gov.au e: cgolder@temora.nsw.gov.au
  

CONFIDENTIALITY NOTICE

The information contained in this email is strictly confidential and prepared solely for the use of the intended recipient(s). The copyright of this communication belongs to the Temora Shire Council.
If you are not the intended recipient, please do not read, use, disseminate, distribute or copy this message or attachments. If you have received this message in error, please notify the sender immediately and delete this message.
Views expressed in this message are those of the individual sender, and are not necessarily the views of the Temora Shire Council.

DISCLAIMER

Before opening any attachments, please check them for viruses and defects. The sender does not accept liability for any viruses, errors or omissions in the contents of this message or Attachment, which arise as a result of email transmission.

From: Temora Shire Council <temshire@temora.nsw.gov.au>
Sent: Friday, 19 February 2021 3:49 PM
To: Claire Golder <cgolder@temora.nsw.gov.au>

Subject: FW: Proposed Audit Scope - Sebastopol Solar Project

From: Susannah Price <sprice@venv.com.au>

Sent: Friday, 19 February 2021 2:46 PM

To: Temora Shire Council <temshire@temora.nsw.gov.au>

Subject: Proposed Audit Scope - Sebastopol Solar Project

Hi,

Please find attached a proposed audit scope for an Independent Environmental Audit of the Jemalong Solar project (located south of Temora) for your consideration. We appreciate if you could please forward this email to the relevant department representative.

If you have any questions, please don't hesitate to contact me.

Regards
Susannah

SUSANNAH PRICE, MSc

Project Manager

Vantage Environmental Management Pty Ltd

PO Box 378 Albury NSW 2640

T (02) 6021 8655 **M** 0421 871 433

www.venv.com.au

🔄 This email is intended for the addressee named and may contain confidential information. If you are not the intended recipient, please delete it and notify the sender.

🌱 Please consider the environment before printing this e-mail

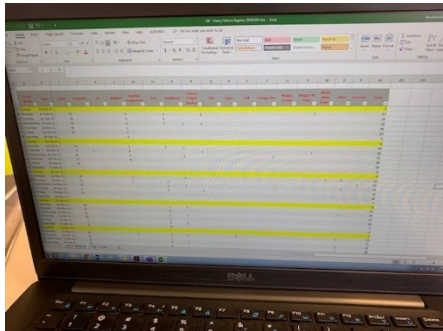
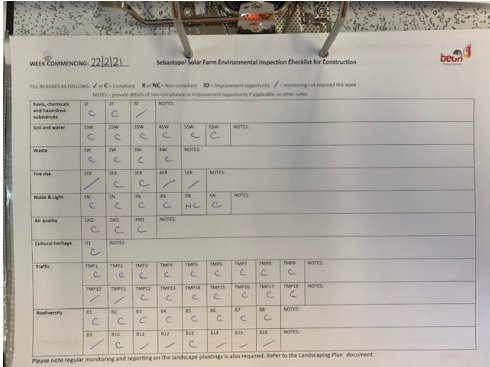
Appendix C

Independent Audit Table

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
SCHEDULE 2: ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
Schedule 2 Condition 1	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	- All evidence collected and observations made during this audit (for construction phase of development). Evidence was not collected regarding the operation, upgrading or decommissioning phases of the development as these phases have not yet occurred.	The environmental management and mitigation measures in place for construction of the Project were deemed to be generally suitable and consistent with Consent conditions.	Compliant (Construction phase only)
TERMS OF CONSENT				
Schedule 2 Condition 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. <i>Note: The general layout of the development is shown in Appendix 1.</i>	The findings of this audit	The development is being carried out generally in accordance with the EIS and the conditions of this Development Consent. No significant adverse impacts associated with construction were identified during the audit.	Compliant
Schedule 2 Condition 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.	N/A	There have been no reported inconsistencies between the plans and documentation referred to in this condition.	Not triggered
Schedule 2 Condition 4	The Applicant must comply with any requirement/s of the Secretary arising from the Department's assessment of: (a) any strategies, plans or correspondence that are submitted in accordance with this 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.	- All evidence collected and observations made during this audit	The proponent has complied with requests and requirements from the Secretary.	Compliant
FINAL LAYOUT PLANS				
Schedule 2 Condition 5	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Secretary, including details on the siting of solar panels and ancillary infrastructure.	- Sebastopol Solar Farm Site Equipment Layout plan (Rev. 1, 08/09/20) - DPIE Post approval lodgement email receipt dated 12/01/21 confirming successful upload of Final Layout Plans - Correspondence dated 19/02/21 from DPIE acknowledging submission of Final Layout Plans (Rev. 1, 08/09/20)	Detailed Final Layout Plans were first lodged with DPIE on 12/01/21 which included details on the location of the solar panels and ancillary infrastructure. The plans were lodged prior to commencement of construction on 14/01/21.	Compliant
UPGRADING OF SOLAR PANELS AND ANCILLARY INFRASTRUCTURE				
Schedule 2 Condition 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.	N/A	Not relevant as upgrade has not occurred	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
WORK AS EXECUTED PLANS				
Schedule 2 Condition 7	Prior to commencing 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.	N/A	Not relevant as operation phase not yet commenced	Not triggered
NOTIFICATION OF DEPARTMENT				
Schedule 2 Condition 8	Prior to commencing the construction, operation, 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. If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to the commencement of the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	- Correspondence (letter) dated 12/01/21 from proponent providing date of Commencement of Construction as 14/01/21	Commencement of construction on 14/01/21 notified to DPIE. Commencement of other phases of development yet to be notified to DPIE. The proponent does not intend to stage any of the phases of development.	Compliant
STRUCTURAL ADEQUACY				
Schedule 2 Condition 9	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 <i>Building Code of Australia</i>. <i>Notes:</i> - Under Part 6 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.	- Temora Shire Council (TSC) Construction Certificate No. 1 – 9098-2019 for security fence, Sebastopol Solar Farm (dated 05/01/21) - TSC Construction Certificate No. 2 – 9098-2019 for Platform A, B & C, Sebastopol Solar Farm (dated 05/01/21) - TSC Construction Certificate No. 3 – 9098-2019 for Inverter Station, Sebastopol Solar Farm (dated 05/01/21)	The proponent has obtained Construction Certificates for security fence, platforms and inverter station.	Compliant
DEMOLITION				
Schedule 2 Condition 10	The Applicant must ensure that all demolition work on site is carried out in accordance with <i>Australian Standard AS 2601-2001: The Demolition of Structures</i> , or its latest version.	N/A	The proponent is not undertaking any demolition work as part of this development	Not triggered
PROTECTION OF PUBLIC INFRASTRUCTURE				
Schedule 2 Condition 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; and (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 for in the conditions of this consent.	N/A	The project has not damaged or relocated any public infrastructure such as transmission lines.	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
OPERATION OF PLANT AND EQUIPMENT				
Schedule 2 Condition 12	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	- Vehicle register/inspections/maintenance records inspected on site. Project team uses an electronic checklist that is used for initial induction of vehicles/ equipment to ensure they're fit for on-site use. A daily pre-start checklist is also completed. TMP Section 8.3 "road inspections" are documented in the weekly environmental inspection checklist. A "Plant Register" is maintained on site that includes details of last and next service, etc.	Completed register/inspections/maintenance records held on site. All relevant information presented within the registers. Information was current to date of audit site visit.	Compliant
SCHEDULE 3: ENVIRONMENTAL CONDITIONS - GENERAL				
TRANSPORT				
Over-Dimensional and Heavy Vehicle Restrictions				
Schedule 3 Condition 1	The Applicant must ensure that the: (a) development does not generate more than: 66 heavy vehicle movements a day during construction, upgrading or decommissioning; 4 over-dimensional vehicle movement during construction, upgrading or decommissioning; and 2 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 metres, unless the Secretary agrees otherwise.	- Traffic Management Plan, Sebastopol Solar Farm, November 2020 (Rev. Final V1.0, 24/11/20) prepared by NGH Environmental - DPIE approval letter of Traffic Management Plan (Rev. Final V1.0, 24/11/20) dated 14/12/20 A register of heavy (HV) and over-dimensional (OD) vehicles is maintained by the Project team. At the time of the audit site visit, the maximum number of daily HV movements had been 43 of the allowable 66. Typically, HV movements were approximately 20-25 per work day. No OD vehicles movements had occurred since the commencement of construction, however due to a design change, an application to DPIE to increase the number of OD movements was noted to be in progress. Project management team conducts ongoing intersection monitoring. Lines have been re-marked and TfNSW have approved additional "Trucks turning" signage for intersection approach. The Delivery Vehicle Register is reviewed and documented on the weekly environmental inspection checklist which is at a frequency of more than monthly.	Heavy vehicle movements were appropriately tracked and consistent with Development Consent conditions.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Schedule 3 Condition 2	The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day.	- Traffic Management Plan, Sebastopol Solar Farm, November 2020 (Rev. Final V1.0, 24/11/20) prepared by NGH Environmental - DPIE approval letter of Traffic Management Plan (Rev. Final V1.0, 24/11/20) dated 14/12/20 - Environmental Inspection Checklists and heavy (HV) and over-dimensional (OD) vehicle tracking register viewed on site. Typical HV volumes were confirmed to range between 0 and 43 movements per day. No OD movements had occurred since the commencement of construction. 	Heavy vehicle movements were appropriately tracked and consistent with Development Consent conditions.	Compliant
Designated Over-Dimensional and Heavy Vehicle Access Route				
Schedule 3 Condition 3	All over-dimensional and heavy vehicles associated with the development must travel to and from the site via Goldfields Way and Eurolee Road and use the approved existing site access point on Eurolee Road, as identified in the figure in Appendix 3. <i>Note: The Applicant is required to obtain relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.</i>	Traffic Management Plan, Sebastopol Solar Farm, November 2020 (Rev. Final V1.0, 24/11/20) prepared by NGH Environmental - DPIE approval letter of Traffic Management Plan (Rev. Final V1.0, 24/11/20) dated 14/12/20 - Environmental Inspection Checklists include relevant information 	Vehicle movements were appropriately tracked and consistent with Development Consent conditions.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Road Upgrades and Site Access				
Schedule 3 Condition 4	Prior to the commencing construction, the Applicant must: (a) upgrade and seal Eurolee Road for a minimum of 380 m from its intersection with Goldfields Way (as identified in the figure in Appendix 3); (b) upgrade the intersection of the Goldfields Way and Eurolee Road, including providing a Basic Right Turn (BAR) and Basic Left Turn (BAL) intersection treatment generally in accordance with the figure in Appendix 5; and (c) upgrade the site access point off Eurolee Road with a Rural Property Access type treatment to cater for the largest vehicle accessing the site. These upgrades must comply with the Austroads Guide to Road Design (as amended by TfNSW supplements), and be carried out to the satisfaction of the relevant roads authority.	- Correspondence (letter) from Junee Shire Council, the relevant roads authority for Eurolee Road, dated 06/01/21, confirming that Council had inspected the construction stage of the Eurolee Road upgrade and deemed it constructed to acceptable standards. - Correspondence (email) from Transport for NSW, the relevant roads authority for Goldfields Way, dated 01/04/21 stating that the upgrade works appear to be completed in accordance with this condition.	Road upgrade and site access works were carried out prior to commencement of construction and to the satisfaction of the relevant roads authority.	Compliant
Operating Conditions				
Schedule 3 Condition 7	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 the site in a forward direction; and (e) development-related vehicles leaving the site are in a clean condition to minimise dirt being tracked onto the sealed public road network.	- Traffic Management Plan, Sebastopol Solar Farm, November 2020 (Rev. Final V1.0, 24/11/20) prepared by NGH Environmental - DPIE approval letter of Traffic Management Plan (Rev. Final V1.0, 24/11/20) dated 14/12/20 - Environmental Inspection Checklists - Auditor's site visit	Triggered during operation phase, although relevant environmental protection measures have been implemented as part of the construction phase.	Not triggered
Traffic Management Plan				
Schedule 3 Condition 6	Prior to commencing construction, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Secretary. This plan must include: (a) details of the transport route to be used for all development-related traffic; (b) a protocol for undertaking independent dilapidation surveys to assess the: - existing condition of Goldfields Way and Eurolee Road on the transport route prior to construction, upgrading or decommissioning activities; and - condition of Goldfields Way and Eurolee Road on the transport route following construction, upgrading or decommissioning activities; (c) a protocol for the repair of Goldfields Way and Eurolee Road if dilapidation surveys identify that the road/s have been damaged during construction, upgrading or decommissioning works; (d) details of the road upgrade and site access works required by conditions 3 and 4 of Schedule 3 of this consent; (e) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning works, including:	- Traffic Management Plan, Sebastopol Solar Farm, November 2020 (Rev. Final V1.0, 24/11/20) prepared by NGH Environmental - DPIE approval letter of Traffic Management Plan (Rev. Final V1.0, 24/11/20) dated 14/12/20 - Environmental Inspection Checklists - Vehicle tracking registers - Toolbox training records - Site Induction (Rev 1.5, 12/03/21) - Signage	The Traffic Management Plan (TMP) was prepared prior to the commencement of construction. DPIE stated that they had carefully reviewed the TMP and were satisfied that the plan met the requirements of this conditions 1 to 6 of Schedule 3. The TMP was developed in consultation with TfNSW and Council as discussed in Section 3 of the TMP. During the Auditor's site visits and interviews of 26 and 27/10/20, evidence of implementation of the TMP was confirmed including records of traffic movement, shuttle bus use, posting of speed limits, tool-box records, etc.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
	- 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; - minimising potential for conflict with the Travelling Stock Route, school buses and other motorists, as far as practicable; - details of the employee shuttle bus service and measures to encourage employee use of this service; - scheduling of haulage vehicle movements to minimise convoy length or platoons; - responding to local climate conditions that may affect road safety such as fog, dust, wet weather; - responding to any emergency repair or maintenance requirements; and - a traffic management system for managing over-dimensional vehicles; and (f) a driver's code of conduct that addresses: - travelling speeds; - driver fatigue; - procedures to ensure that drivers adhere to the designated transport route/s; and - procedures to ensure that drivers implement safe driving practices. Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.			
LANDSCAPING				
Vegetation Buffer				
Schedule 3 Condition 7	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 commencing operations; (b) be comprised of species that are endemic to the area; (c) within 3 years of commencing construction, effectively screen views of the solar panels and ancillary infrastructure on-site from surrounding residences; and (d) be properly maintained with appropriate weed management.	- Landscaping Plan, Sebastopol Solar Farm SSD 9098, December 2020 (Rev. Final V1.4, 22/01/21) prepared by NGH Environmental - DPIE approval letter of Landscaping Plan (Rev. Final V1.3, 22/12/20) dated 24/12/20 - Biodiversity Management Plan, Sebastopol Solar Farm, December 2020 (Rev. Final V1.0, 04/12/20) prepared by NGH Environmental - DPIE approval letter of Biodiversity Management Plan (Rev. Final V1.0, 04/12/20) dated 21/12/20 - Viewing of designated buffer zone by Auditor during site visit - Viewing of retained vegetation from clearing for use in habitat enhancement during site visit	Proponent has reported that establishment of vegetation buffer will occur during the final stages of construction. Seedling/ tube-stock procurement has commenced. Preparatory works observed during site visit inclusive of establishment of exclusion zone fencing and signage. Section 6.1.1 of the Landscape Plan noted planting of perimeter plantings will be undertaken in the prior to commencing operations. Section 6.1.1 and Appendix B.3 of the LP discuss the endemic species selected for planting. Section 2.3, 6.1.1, 6.2 and Appendix B.4 of the LP discuss how the vegetation buffer will be effective at screening the view of the Project. Section 5.1.3 and Appendix B4.6 of the LP and the Biodiversity Management Plan discuss weed management.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Landscaping Plan				
Schedule 3 Condition 8	Prior to commencing construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with Council, to the satisfaction of the Secretary. This plan must include: (a) a description of measures that would be implemented to ensure that the vegetated buffer achieves the objectives of condition 7 (a) – (d) of this consent; (b) include a program to monitor and report on the effectiveness of these measures; and (c) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for the completion of actions. Following the Secretary's approval, the Applicant must implement the Landscaping Plan.	- Landscaping Plan, Sebastopol Solar Farm SSD 9098, December 2020 (Rev. Final V1.4, 22/01/21) prepared by NGH Environmental - DPIE approval letter of Landscaping Plan (Rev. Final V1.3, 22/12/20) dated 24/12/20	The Landscaping Plan (LP) was prepared prior to the commencement of construction (Rev. Final V1.3). DPIE stated that they had carefully reviewed the LP and were satisfied that it was consistent with this condition. The LP was developed in consultation with Council as discussed in Section 4 of the LP. Appendices B4.5 and B4.6 of the LP list a program to monitor and report on effectiveness of landscaping. Section 7.2 of the LP lists the roles and responsibilities for monitoring, reviewing and implementing the LP. Implementation of the Landscape Plan will occur once planting is undertaken, which is scheduled during the final stages of construction.	Compliant
Land Management				
Schedule 3 Condition 9	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; and (c) manage weeds within this ground cover.	- Landscaping Plan, Sebastopol Solar Farm SSD 9098, December 2020 (Rev. Final V1.4, 22/01/21) prepared by NGH Environmental - DPIE approval letter of Landscaping Plan (Rev. Final V1.3, 22/12/20) dated 24/12/20 - Biodiversity Management Plan, Sebastopol Solar Farm, December 2020 (Rev. Final V1.0, 04/12/20) prepared by NGH Environmental - DPIE approval letter of Biodiversity Management Plan (Rev. Final V1.0, 04/12/20) dated 21/12/20	Not relevant until after construction (or upgrading) is completed. Section 6.1.3 of the Landscaping Plan and Appendix E of the Biodiversity Management Plan discuss the requirements of this condition.	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status																												
BIODIVERSITY																																
Biodiversity Offsets																																
Schedule 3 Condition 10	Within two years of commencing construction under this consent, unless the Secretary agrees otherwise, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below to the satisfaction of BCD. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offset Scheme and can be achieved by: (a) acquiring or retiring ‘biodiversity credits’ within the meaning of the Biodiversity Conservation Act 2016; (b) making payments into an offset fund that has been developed by the NSW Government; or (c) providing supplementary measures. <i>Table 1: Ecosystem Credit Requirements</i> <table><tr><th>Vegetation Community</th><th>PCT ID</th><th>Credits Required</th><th>Total</th></tr><tr><td>White Cypress Pine woodland on sandy loams in CentralNSW wheatbelt</td><td>70</td><td>1</td><td rowspan="3">29.75</td></tr><tr><td>White Box – White Cypress – Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion</td><td>267</td><td>25.75</td></tr><tr><td>White Box grassy woodland in the upper slopes sub-region of the NSWSouth Western Slopes Bioregion</td><td>266</td><td>3</td></tr></table> <i>Table 2: Species Credit Requirements</i> <table><tr><th>Species Credit Species</th><th>Credits Required</th><th>Total</th></tr><tr><td>Austrostipa metatoris</td><td>3</td><td rowspan="5">48</td></tr><tr><td>Pine Donkey Orchid (Diuris tricolor)</td><td>11</td></tr><tr><td>Small Purple-pea (Swainsona recta)</td><td>14</td></tr><tr><td>Silky Swainson-pea (Swainsona sericea)</td><td>14</td></tr><tr><td>Superb Parrot (Polytelis swainsonii)</td><td>6</td></tr></table>	Vegetation Community	PCT ID	Credits Required	Total	White Cypress Pine woodland on sandy loams in CentralNSW wheatbelt	70	1	29.75	White Box – White Cypress – Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion	267	25.75	White Box grassy woodland in the upper slopes sub-region of the NSWSouth Western Slopes Bioregion	266	3	Species Credit Species	Credits Required	Total	Austrostipa metatoris	3	48	Pine Donkey Orchid (Diuris tricolor)	11	Small Purple-pea (Swainsona recta)	14	Silky Swainson-pea (Swainsona sericea)	14	Superb Parrot (Polytelis swainsonii)	6	- Biodiversity Management Plan, Sebastopol Solar Farm, December 2020 (Rev. Final V1.0, 04/12/20) prepared by NGH Environmental - DPIE approval letter of Biodiversity Management Plan (Rev. Final V1.0, 04/12/20) dated 21/12/20 - Proponent reported that, as of 24/03/21, the biodiversity credits had not yet been procured	Biodiversity credits have not yet been procured as are not required to be retired until 14/01/23, i.e. within two years of commencement of construction.	Compliant
Vegetation Community	PCT ID	Credits Required	Total																													
White Cypress Pine woodland on sandy loams in CentralNSW wheatbelt	70	1	29.75																													
White Box – White Cypress – Western Grey Box shrub/grass/forb woodland in the NSW South Western Slopes Bioregion	267	25.75																														
White Box grassy woodland in the upper slopes sub-region of the NSWSouth Western Slopes Bioregion	266	3																														
Species Credit Species	Credits Required	Total																														
Austrostipa metatoris	3	48																														
Pine Donkey Orchid (Diuris tricolor)	11																															
Small Purple-pea (Swainsona recta)	14																															
Silky Swainson-pea (Swainsona sericea)	14																															
Superb Parrot (Polytelis swainsonii)	6																															

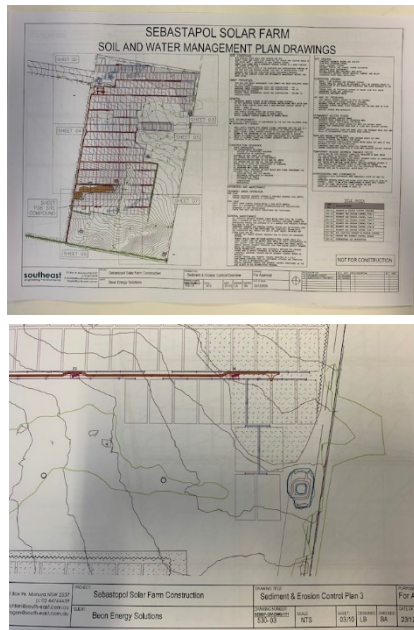
Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Biodiversity Management Plan				
Schedule 3 Condition 11	Prior to commencing construction, the Applicant must prepare a Biodiversity Management Plan for the development in consultation with BCD, and to the satisfaction of the Secretary. This plan must: (a) include a description of the measures that would be implemented for: - managing the remnant vegetation and fauna habitat on site; - minimising clearing and avoiding unnecessary disturbance of vegetation that is associated with the construction and operation of the development; - minimising the impacts to fauna on site and implementing fauna management protocols; - avoiding the removal of hollow-bearing trees during spring to avoid the main breeding period for hollow-dependent fauna; - rehabilitating and revegetating temporary disturbance areas with species that are endemic to the area; - protecting vegetation and fauna habitat outside the approved disturbance areas; - maximising the salvage of vegetative and soil resources within the approved disturbance area for beneficial reuse in the enhancement or the rehabilitation of the site; and - controlling weeds and feral pests; and (b) include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions. Following the Secretary's approval, the Applicant must implement the Biodiversity Management Plan. <i>Note: If the biodiversity credits are retired via a Biodiversity Stewardship Agreement, then the Biodiversity Management Plan does not need to include any of the matters that are covered under the Biodiversity Stewardship Agreement.</i>	- Biodiversity Management Plan, Sebastopol Solar Farm, December 2020 (Rev. Final V1.0, 04/12/20) prepared by NGH Environmental - DPIE approval letter of Biodiversity Management Plan (Rev. Final V1.0, 04/12/20) dated 21/12/20 - Vegetation Clearing letter report (NGH Environmental [NGH], 03/03/21) - Site Induction (Rev 1.5, 12/03/21) and toolbox records - Environmental Inspection Checklists	The Biodiversity Management Plan (BMP) was prepared prior to the commencement of construction. DPIE stated that they had carefully reviewed the BMP and were satisfied that it was consistent with this condition. The BMP was developed in consultation with BCD as discussed in Section 1.6 of the BMP. The BMP covers the description of measures that would be implemented. Sections 7 – 12 of the BMP discuss the roles and responsibilities for monitoring, reviewing and implementation of the BMP. A pre-clearing survey was undertaken by ecologists from NGH in accordance with the BMP. Clearing of habitat trees was undertaken on 27-28/01/21 and supervised by NGH ecologists. The clearing of habitat trees was not undertaken during spring in accordance with this condition. The salvage of vegetative and soil resources has been maximised and the auditor noted the following during the site visit: - Top-soil stripped and stockpiled for reuse - Cleared vegetation retained for future reuse in habitat enhancement Site induction contains information regarding flora and fauna management. Additional tool-boxing has been completed. Weekly inspection records contain relevant biodiversity management content.	Compliant

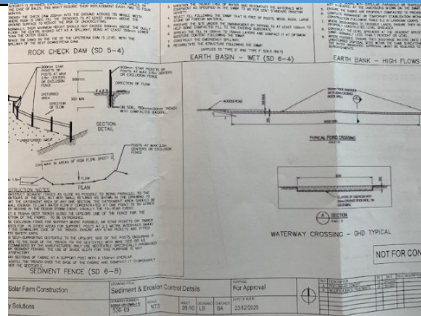
Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
AMENITY				
Construction, Upgrading and Decommissioning Hours				
Schedule 3 Condition 12	Unless the Secretary agrees otherwise, the Applicant may only undertake construction, upgrading or decommissioning activities on site between: (a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; and (c) at no time on Sundays and NSW public holidays. The following construction, upgrading or decommissioning activities may be undertaken outside these hours without the approval of the Secretary: - activities that are inaudible at non-associated receivers; - 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.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Sebastopol Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. 1.0, 19/02/21) prepared by beon. - Site Induction (Rev 1.5, 12/03/21) and toolbox records - Interviews with site personnel	Construction hours are listed within Section 1.2.3 of the EMS and Section 1.9 of the WHSEMP. Site induction lists construction hours in accordance with this condition. Approved construction hours are monitored by Construction Manager and HSE Advisor. During site interview and visit of 25 and 26/03/2021, the Auditor confirmed site personnel were aware of permitted construction hours. Approved construction hours are also presented in the site induction.	Compliant
Noise				
Schedule 3 Condition 13	The Applicant must minimise the noise generated by any construction, upgrading or decommissioning activities on site in accordance with the best practice requirements outlined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version.	- Sebastopol Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. 1.0, 19/02/21) prepared by beon. - Environmental Inspection Checklists - Site Induction (Rev 1.5, 12/03/21) and toolbox records	Noise management and mitigation measures are discussed in Section 15.12 of the WHSEMP. Site works deemed to be consistent with relevant WHSEMP mitigation measures. No high-noise generating activities noted during site visit of 25 and 26/03/2021	Compliant
Dust				
Schedule 3 Condition 14	The Applicant must minimise the dust generated by the development.	Sebastopol Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. 1.0, 19/02/21) prepared by beon. - Environmental Inspection Checklists - Site Induction (Rev 1.5, 12/03/21) and toolbox records	Dust (and air quality) management and mitigation measures are discussed in Section 15.13 of the WHSEMP. Site works deemed to be consistent with relevant Environmental Management Strategy mitigation measures. No significant dust emission noted during site visit of 25 and 26/03/21. Five (5) full time water carts are available for on-site use.	Compliant
Visual				
Schedule 3 Condition 15	The Applicant must: (a) minimise the off-site visual impacts of the development, including the potential for any glare or reflection; (b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and (c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	- Landscaping Plan, Sebastopol Solar Farm SSD 9098, December 2020 (Rev. Final V1.4, 22/01/21) prepared by NGH Environmental - DPIE approval letter of Landscaping Plan (Rev. Final V1.3, 22/12/20) dated 24/12/20 - Proponent confirmed Project designs have incorporated relevant measures to address potential visual impacts.	Not relevant until after construction (or upgrading) is completed. Section 6.1.4 of the Landscaping Plan discusses the requirements of this condition.	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Lighting				
Schedule 3 Condition 16	The Applicant must: (a) minimise the off-site lighting impacts of the development; and (b) ensure that any external lighting associated with the development: - is installed as low intensity lighting (except where required for safety or emergency purposes); - does not shine above the horizontal; and - complies with <i>Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Proponent confirmed Project designs have incorporated relevant measures to address potential lighting impacts, although at the time of the Audit the lighting design had not been finalised for construction.	Minimal lighting is proposed and will include down-lights on sensors to minimise potential off-site impacts.	Not triggered
HERITAGE				
Protection of Heritage Items				
Schedule 3 Condition 17	The Applicant must ensure that the development avoids (as far as practicable) any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 4. If impacts on these items cannot be avoided, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location on site, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version. <i>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 4.</i>	- Cultural Heritage Management Plan (CHMP), Sebastopol Solar Farm, September 2020 (Rev. Final V1.6, 16/09/20) prepared by NGH Environmental - DPIE approval letter of Cultural Heritage Management Plan (Rev. Final V1.6, 16/09/20) dated 17/09/20 - Preliminary salvage results - Site Induction (Rev 1.5, 12/03/21) - Environmental Inspection Checklists - Site visit of 26/03/21	31 Aboriginal heritage items were to be salvaged and relocated and following salvage, new site card/s must be completed to record their new location on the AHIMS database Appropriate exclusion zone signage fencing observed during site visit of 26/03/21 Heritage mitigation measures were noted to have been assessed and recorded within Weekly Environmental Inspection checklists Non-compliance No. 1 (SSF-IEA-21-NC1): Not all Aboriginal heritage items identified in Table 1 of Appendix 4 (and referred to in Schedule 3, Condition 17) of the Development Consent could be identified and recovered at the time of salvage works on 14 and 15 December 2020 as additional site disturbance from non-Project related agricultural activities (crop sowing and harvesting) had occurred between the time the Aboriginal Cultural Heritage Assessment Report (NGH Environmental, November 2018) was prepared, which listed the heritage items, and the commencement of salvage works. It was reported that the proponent was not in possession and/or control of the Project site at the time the cropping activities occurred. Notwithstanding this, it is considered that the proponent should have raised an internal investigation and informed DPIE and other relevant stakeholders that some previously identified heritage items could not be relocated at the time of the salvage program Recommendation No. 1 (SSF-IEA-21-R1): In response to Non-compliance No. 1 the actions are recommended: - Advise DPIE and relevant stakeholders of salvage outcomes; and - Complete required heritage reporting and prepare Aboriginal Site Impact Recording Form (ASIRF), as	Non-compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
			necessary, for inclusion within the Aboriginal Heritage Information Management System (AHIMS) database. Salvaged items have been catalogued and are held with a cultural heritage consultant in Wagga Wagga. Return of Rights is pending and a site visit and training day with Registered Aboriginal Parties is scheduled for 08 April 2021. At that time, proposed artifact reburial locations will be presented for discussion and approval by relevant parties. Weekly checklist documents protected heritage sites. This is also covered as part of the site induction content and that severed disciplinary actions and/or dismissal will be a consequence of disturbing these areas.	
Schedule 3 Condition 18	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 2 of Appendix 4 or located outside the approved development footprint.	- Cultural Heritage Management Plan (CHMP), Sebastopol Solar Farm, September 2020 (Rev. Final V1.6, 16/09/20) prepared by NGH Environmental - DPIE approval letter of Cultural Heritage Management Plan (Rev. Final V1.6, 16/09/20) dated 17/09/20 - Exclusion zone fencing and signage - Boundary fencing - Site Induction (Rev 1.5, 12/03/21) - Inspection checklists 	- Exclusion zone fencing and signage for heritage items within the construction footprint is in place - Boundary fencing installed to protect off-site items - In accordance with the CHMP the original development design was modified to exclude impacts to possible modified trees within the Project area. - Weekly environmental inspections are conducted to confirm heritage exclusion zones are in place - Heritage management issues are discussed in the site induction content and tool-boxing is conducted. The site HSE Advisor confirmed that severe disciplinary action and/or dismissal is a consequence of disturbing these areas.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Heritage Management Plan				
Schedule 3 Condition 19	Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with BCD and Aboriginal Stakeholders; (c) include a description of the measures that would be implemented for: - protecting the Aboriginal heritage items identified in Table 2 in Appendix 4 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction and/or pre-construction minor works; - salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 1 in Appendix 4, if impacts to them cannot be avoided; - a contingency plan and reporting procedure if: - previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered; - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and - ongoing consultation with Aboriginal stakeholders during the implementation of the plan; (d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.	- Cultural Heritage Management Plan (CHMP), Sebastopol Solar Farm, September 2020 (Rev. Final V1.6, 16/09/20) prepared by NGH Environmental - DPIE approval letter of Cultural Heritage Management Plan (Rev. Final V1.6, 16/09/20) dated 17/09/20 - Site Induction (Rev 1.5, 12/03/21)	The CHMP was prepared prior to the commencement of construction. DPIE stated that they had carefully reviewed the CHMP and were satisfied that it was consistent with the conditions of consent. The CHMP was developed in consultation with Heritage NSW/BCD and Aboriginal Stakeholders (Registered Aboriginal Parties) as shown by comments provided in Section 4 of the CHMP. Proponent and their contractor reported that no chance finds have been identified on site. The general site induction was reviewed during the audit program and it was noted that it contained appropriate content regarding Aboriginal Heritage management including: - Discussion of "No go" zones, i.e. exclusion zones around heritage sites - A map of the site showing the protected sites - What to do if there is a discovery of a suspected Aboriginal object, historic relic or human skeletal remains - Photographic examples of Aboriginal stone artefacts Salvaged items have been catalogued and are held with a cultural heritage consultant in Wagga Wagga. Return of Rights is pending and a site visit and training day with Registered Aboriginal Parties is scheduled for 08 April 2021. At that time, proposed artifact reburial locations will be presented for discussion and approval by relevant parties.	Compliant
SOIL & WATER				
Water Supply				
Schedule 3 Condition 20	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. <i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain the necessary water licences for the development.</i>	- Beon personnel have stated that trucks are being filled with water at Goldenfields Water's standpipe in Temora and there is an adequate supply for the Project's requirements. Further, they have stated that no water licence is required to use the standpipe.	It is understood that sufficient water can be sourced from Goldenfields Water's stand-pipe in Temora and no change to the scale of development is necessary.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Water Pollution				
Schedule 3 Condition 21	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	- Sebastopol Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) For Construction (Rev. 1.0, 19/02/21) prepared by beon. - Soil and Water Management Plan Drawings (Rev B, 13/01/21) - Environmental Inspection Checklists - On-site environmental controls were viewed during site visit 	Erosion/sedimentation controls observed were consistent with Soil and Water Management Plan Drawings during site visit. No evidence of off-site flows of sediment-laden water and/or erosion and/or sedimentation were observed during the site visit despite a recent significant weather event that resulted in over 100mm of rainfall between 21-24/03/2021 as the closest Bureau of Meteorology monitoring station in Temora, NSW (http://www.bom.gov.au/climate/dwo/IDCJDW2130.latest.shtml)	Compliant
Operating Conditions				
Schedule 3 Condition 22	The Applicant must: (a) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version; and (b) ensure all works (including watercourse crossings) are undertaken in accordance with the following, unless DPIE Water agrees otherwise: • <i>Guidelines for Controlled Activities on Waterfront Land</i> (2012), or its latest version; and • <i>Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings</i> (2004), or its latest version.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Beon Work Health Safety and Environmental Management Plan for Construction, February 2021 (Rev 1.0 19/02/21) - Soil and Water Management Plan Drawings (Rev B, 13/01/21) - Environmental inspection checklists (weekly) - Site visit of 26/03/21	DPIE approved EMS has been developed with reference to relevant guidelines and requirements. Erosion/sedimentation controls observed were consistent with Soil and Water Management Plan during site visit.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
				
HAZARDS				
Fire Safety Study				
Schedule 3 Condition 23	Prior to commencing construction of the battery storage facility, unless the Secretary agrees otherwise, the Applicant must prepare a Fire Safety Study of the development, in consultation with Fire and Rescue NSW, and to the satisfaction of the Secretary. The study must: (a) be consistent with the: - Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; and - NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and (b) describe the final design of the battery storage facility. Following the Secretary's approval, the Applicant must implement the measures described in the FireSafety Study.	N/A	The proponent have stated that battery storage is not planned for this Project.	Not triggered
Storage and Handling of Dangerous Materials				
Schedule 3 Condition 24	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Handbook</i> if the chemicals are liquids. In the event of an inconsistency between the requirements listed from (a) to (b) above, the most stringent requirement must prevail to the extent of the inconsistency.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Sebastopol Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. 1.0, 19/02/21) prepared by beon. - Environmental Inspection Checklists - Interviews and site visit 	Review of spill prevention and clean-up measures documented in weekly Environmental Inspection Checklists. Well stocked spill kits present at key locations across Project site. Bunded storage containers present for flammable and combustible liquids. Safety Data Sheets held on-site. Portable bunds present at location where fuelling occurs.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
				
Operating Conditions				
Schedule 3 Condition 25	The Applicant must: (a) minimise the fire risks of the development; (b) ensure that the development: - includes at least a 10 metre defendable space around the perimeter of the solar array area and battery storage facility that permits unobstructed vehicle access; - manages the defendable space and solar array areas as an Asset Protection Zone; - complies with the relevant asset protection requirements in the RFS's <i>Planning for Bushfire Protection 2006 (or equivalent)</i> and <i>Standards for Asset Protection Zones</i>; - 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 construction of the development, and prior to commencing operations.	N/A	This condition discusses operating conditions and must be complied with prior to commencement of operations and is therefore not relevant to this audit.	Not triggered
Emergency Response Plan				
Schedule 3 Condition 26	Prior to commissioning development, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development, to the satisfaction of Fire and Rescue NSW and the RFS. The Applicant must keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times. The plan must: (a) be consistent with the Department of Planning's <i>Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'</i>; (b) identify the fire risks and controls of the development; and (c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site.	N/A	This condition must be complied with prior to commencement of operations and is therefore not relevant to this audit. However, Beon confirmed the Fire Management and Emergency Response Plan has been prepared in draft by NGH Environmental and is currently being reviewed by RFS and FRNSW.	Not triggered

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status										
WASTE														
Schedule 3 Condition 27	The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA’s <i>Waste Classification Guidelines 2014</i> (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.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Sebastopol Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) For Construction (Rev. 1.0, 19/02/21) prepared by Beon - Waste registers - Environmental Inspection Checklists - Site visits and interviews 	Evidence of appropriate waste management, including a high standard of segregation, sorting and storage, was noted during the site visit. Housekeeping was of a very high standard across the entire Project site. An electronic register of waste streams was maintained by the contractor. Innovative systems were in place to ensure wastes were appropriately and effectively managed. Particular attention was paid to appropriate managing of wastes, such as plastic baling material and cardboard, that could easily be transported by wind to adjoining farmland areas.	Compliant										
DECOMMISSIONING AND REHABILITATION														
Schedule 3 Condition 28	Within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must comply with the objectives in Table 3. <i>Table 3: Rehabilitation Objectives</i> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Project site</td><td> • Safe, stable and non-polluting • Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use </td></tr><tr><td>Solar farm infrastructure</td><td> • To be decommissioned and removed, unless the Secretary agrees otherwise </td></tr><tr><td>Land use</td><td> • Restore land capability to pre-existing use </td></tr><tr><td>Community</td><td> • Ensure public safety </td></tr></table>	Feature	Objective	Project site	• Safe, stable and non-polluting • Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use	Solar farm infrastructure	• To be decommissioned and removed, unless the Secretary agrees otherwise	Land use	• Restore land capability to pre-existing use	Community	• Ensure public safety	N/A	This condition is relevant to a period after cessation of operations and is therefore not relevant to this audit.	Not triggered
Feature	Objective													
Project site	• Safe, stable and non-polluting • Minimise the visual impact of any above ground ancillary infrastructure agreed to be retained for an alternative use													
Solar farm infrastructure	• To be decommissioned and removed, unless the Secretary agrees otherwise													
Land use	• Restore land capability to pre-existing use													
Community	• Ensure public safety													

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
SCHEDULE 4 - ENVIRONMENTAL MANAGEMENT AND REPORTING				
ENVIRONMENTAL MANAGEMENT				
Environmental Management Strategy				
Schedule 4 Condition 1	Prior to commencing 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; - 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.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Sebastopol Solar Farm Complaint Documentation Register (obtained 24/03/21) - Environmental Inspection Checklists - Site visit and interviews - Project website and community notifications	A copy of the approved Environmental Management Strategy (EMS) was held within the Project site office. Site personnel were familiar with the content of the strategy and evidence of implementation was observed during the interviews and site visit. A number of completed Environmental Inspection Checklists were reviewed by the Auditor and all were noted to be correctly filled-out and contained information that was directly relevant to and consistent with the EMS. Non-compliance No. 2 (SSF-IEA-21-NC2): Section 5.1.2 of the Environmental management Strategy (EMS) was not implemented in accordance with Schedule 4, Condition 1 of the Development consent. Section 5.1.2 of the EMS stated: <i>"During construction Beon will ensure that sufficient water for firefighting (minimum 20,000 L water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection) is stored in water tanks located on site adjacent to the internal access road"</i>. It was confirmed that in excess of 20,000L of water that could be used for firefighting was held on site within water carts, however the proposed 20,000L tank would be installed to satisfy operational requirements as detailed in Schedule 3, Condition 25 of the Development Consent Recommendation No. 2 (SSF-IEA-21-R2): In response to Non-compliance No. 2, update EMS to confirm tank will be installed for operation, rather than construction, as per Development consent Non-compliance No.3 (SSF-IEA-21-NC3): Section 7.5 of the EMS was not implemented in accordance with Schedule 4, Condition 1 of the Development Consent as no evidence of the publication of newspaper advertisements and posting of newsletters and project updates on a prominent community noticeboard in Temora and Junee was identified during the audit. Recommendation No. 3 (SSF-IEA-21-R3): In response to Non-compliance No. 3, prepare and publish required notifications or amend EMS to document only those stakeholder and community and engagement initiatives that can be reasonably and practicably achieved.	Non-compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
Revision of Strategies and Plans				
Schedule 4 Condition 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: • 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.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Sebastopol Solar Farm Complaint Documentation Register (obtained 24/03/21) - Environmental Inspection Checklists - Site visit and interviews - Project website and community notifications	Based on review and implementation of the EMS the following continual environmental management improvement opportunities were identified during the audit: • Table 5-1 and Section 5.4.2 of the EMS could be updated in regard to the Fire Safety Study to explain that it has not been prepared as battery storage is not being constructed on the Project; and • Project phone contact information that is presented within the EMS and associated management plans to allow community to obtain project-related information should be reviewed to ensure the number is consistent in all relevant documentation.	Compliant
Updating and Staging of Strategies, Plans or Programs				
Schedule 4 Condition 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, plans 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 the parties referred to under the relevant condition of this consent. <i>Notes:</i> • <i>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.</i> • <i>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.</i>	N/A	No strategies, plans or program are currently required by this consent on a progressive basis. Based on review and implementation of the EMS the following continual environmental management improvement opportunities were identified during the audit: • Table 5-1 and Section 5.4.2 of the EMS could be updated in regard to the Fire Safety Study to explain that it has not been prepared as battery storage is not being constructed on the Project; and • Project phone contact information that is presented within the EMS and associated management plans to allow community to obtain project-related information should be reviewed to ensure the number is consistent in all relevant documentation.	Compliant

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
COMPLIANCE				
Incident Notification				
Schedule 4 Condition 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.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Sebastopol Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. 1.0, 19/02/21) prepared by Beon - At the time of the audit interviews and site visit, the proponent and their contractor confirmed that there had not been any non-compliance matters identified since the commencement of construction	It was reported by the proponent and their contractor that there had not been any incidents since the commencement of construction.	Not triggered
Non-Compliance Notification				
Schedule 4 Condition 5	The Department must be notified in writing via the Major Projects website portal 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 noncompliance (if known) and what actions have been done, or will be, undertaken to address the noncompliance.	- Environmental Management Strategy (EMS), Sebastopol Solar Farm, December 2020 (Rev. Final V1.1, 22/12/20) prepared by NGH Environmental - DPIE approval letter of Environmental Management Strategy (Rev. Final V1.1, 22/12/20) dated 23/12/20 - Sebastopol Solar Farm Work Health Safety And Environment Management Plan (WHSEMP) for Construction (Rev. 1.0, 19/02/21) prepared by Beon - At the time of the audit interviews and site visit, the proponent and their contractor confirmed that there had not been any non-compliance matters identified since the commencement of construction	It was reported by the proponent and their contractor that there have not been any non-compliances since the commencement of construction.	Compliant
Compliance Reporting				
Schedule 4 Condition 6	<i>(deleted)</i>	N/A	N/A	N/A

Approval (ID)	Requirement	Evidence collected	Independent Audit Findings and Recommendations	Compliance Status
INDEPENDENT ENVIRONMENTAL AUDIT				
Schedule 4 Condition 7	The Applicant must commission and pay the full cost of Independent Environmental Audits of the development. The audits must: (a) be prepared in accordance with the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020); (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 prepared, unless otherwise agreed with the Secretary: i. within 3 months of commencing construction; ii. within 3 months of commencement of operations; and iii. as directed by the Secretary; (d) be carried out in consultation with the relevant agencies; (e) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and (f) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent; unless the Secretary agrees otherwise. 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, confirmed in writing.	- This Independent Environmental Audit (IEA) report	This IEA report has been prepared within 3 months of commencing construction. It is noted that another IEA is due within 3 months of commencing operation. The preparation of the current IEA program commenced with auditor approval/endorsement by DPIE on 15/02/21 which is within 3 months of commencement of construction (14/01/21).	Compliant
ACCESS TO INFORMATION				
Schedule 4 Condition 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 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 if the construction, operation or decommissioning of the development is to be staged; • how complaints about the development can be made; • a complaints register; • compliance reports; • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and (b) keep this information up to date.	Project website: http://sebastopolsolarfarm.com/ (viewed 25/03/21)	Relevant documents, as noted below, have been made publicly available via links on the Project website (when viewed on 25/03/21): • EIS • Final layout plans for the development • Conditions of Consent (Mod 1, July 2020) • Biodiversity Management Plan • Email to lodge complaints • Complaints register (1 complaint listed) • Traffic Management Plan • Environmental Management Strategy • Cultural Heritage Management Plan • Landscaping Plan	Compliant

Appendix D

Site Inspection Photographs (25-26 March 2021)



Plate 1: View of the upgraded Eurolee Road, looking east from the intersection of the Goldfields Way. The distance of new asphalt seal on Eurolee Road was measured during the audit to be approximately 400m from the intersection.



Plate 2: View of the recently installed solar panels associated with the northwest portion of the Project site. This area was the most advanced area of construction. Vegetative cover was generally good in this location and site layout was noted to be consistent with the Development Consent.



Plate 3: View of the sediment fencing and water quality basin installed on the southwest portion of the site as part of the Project erosion and sedimentation control measures documented within the Soil and Water Management Plan. No evidence of significant sedimentation and/or erosion was noted during the Auditor's site visit of 26/03/21.



Plate 4: View of sensitive area protection signage and fencing installed in accordance with Development Consent Schedule 3, Condition 18.



Plate 5: View of retained vegetation from site clearing activities for future re-use as habitat enhancement during site rehabilitation and landscaping as per Development Consent Schedule 3, Condition 11(a).



Plate 6: View of the site fuelling area at the time of the auditor's site visit on 26/03/21. An appropriately stocked spill kit was noted to be present along with signage, bunded storage and a portable spill containment bund.



Plate 7: View of segregated construction waste and re-use materials prior to off-site transport for recycling or disposal. General housekeeping was noted to be of a very high standard across the project site.



Plate 8: View of one (1) of five (5) site-based water carts used as part of the strategy to manage air quality during construction. No significant dust emissions were noted during site visit of 26/03/21.

Appendix E

Independent Audit Declaration Form

INDEPENDENT AUDIT REPORT DECLARATION FORM

(Template from DPIE Independent Audit Post Approval Requirements, May 2020).

Project Name	Sebastopol Solar
Consent Number	SSD 9098
Description of Project	Solar farm
Project Address	off Eurolee Road, Erin Vale
Proponent	Sebastopol Solar Farm
Title of Audit	Independent Audit Report: Sebastopol Solar Farm SSD 9098 (April 2021)
Date	16 April 2021

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

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

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor	Toby Hobbs
Signature	
Qualification	MEnvMgmt, Principal Auditor (Exemplar Global)
Company	Vantage Environmental Management Pty Ltd
Company Address	PO Box 378, Albury NSW 2640

27 April 2021

Major Projects
Department of Planning, Industry and Environment (DPIE)
Sydney NSW 2000

To whom it may concern,

RE: Independent Environmental Audit Sebastopol Solar Farm - April 2021

An Independent Environmental Audit was undertaken by Vantage Environmental Management Pty Ltd at the Sebastopol Solar Farm, in accordance with the requirements of Schedule 4, Condition 7 of the Project's Development Consent (Modification 1, July 2020) and conducted in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020).

In reference to the finalised audit report, Beon Energy Solutions wishes to provide the following response to all audit findings, including recommendations and opportunities for improvement.

There were three (3) non-compliances identified with Development Consent conditions and the associated management plans and strategies reviewed during the audit program as noted below:

1. *Non-compliance No. 1 (SSF-IEA-21-NC1): Not all Aboriginal heritage items identified in Table 1 of Appendix 4 (and referred to in Schedule 3, Condition 17) of the Development Consent could be identified and recovered at the time of salvage works on 14 and 15 December 2020 as additional site disturbance from non-Project related agricultural activities (crop sowing and harvesting) had occurred between the time the Aboriginal Cultural Heritage Assessment Report (NGH Environmental, November 2018) was prepared, which listed the heritage items, and the commencement of salvage works. It was reported that the proponent was not in possession and/or control of the Project site at the time the cropping activities occurred. Notwithstanding this, it is considered that the proponent should have raised an internal investigation and informed DPIE and other relevant stakeholders that some previously identified heritage items could not be relocated at the time of the salvage program.*

Recommendation No. 1 (SSF-IEA-21-R1): In response to Non-compliance No. 1 the actions are recommended:

- a) *Advise DPIE and relevant stakeholders of salvage outcomes; and*

b) Complete required heritage reporting and prepare Aboriginal Site Impact Recording Form (ASIRF), as necessary, for inclusion within the Aboriginal Heritage Information Management System (AHIMS) database;

In response to Non-compliance recommendation 1a, a draft Aboriginal Cultural Heritage Salvage Report can be submitted to DPIE, as notification that identified heritage items could not be relocated at the time of the salvage program, if deemed necessary. A finalised version of the Report will be submitted shortly after the reburial of the salvage artefacts, which is scheduled for the coming months.

Additionally, in response to Recommendation 1b, NGH (the consultant responsible for the salvage program) have confirmed that impact site cards have been submitted to AHIMS for all the sites salvaged within the approved development footprint for the Sebastopol Solar Farm.

2. Non-compliance No. 2 (SSF-IEA-21-NC2): Section 5.1.2 of the Environmental management Strategy (EMS) was not implemented in accordance with Schedule 4, Condition 1 of the Development consent. Section 5.1.2 of the EMS stated: "During construction Beon will ensure that sufficient water for firefighting (minimum 20,000 L water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection) is stored in water tanks located on site adjacent to the internal access road". It was confirmed that in excess of 20,000L of water that could be used for firefighting was held on site within water carts, however the proposed 20,000L tank would be installed to satisfy operational requirements as detailed in Schedule 3, Condition 25 of the Development Consent.

Recommendation No. 2 (SSF-IEA-21-R2): In response to Non-compliance No. 2, update EMS to confirm tank will be installed for operation, rather than construction, as per Development consent.

In response to Non-compliance No. 2, Beon have ordered and arranged for the 20,000 L water supply tank to be installed onsite in the coming weeks. This is an alternative resolution to that provided in the recommendation. Beon deemed this a more time and cost-effective response to the Non-compliance. Despite this not being installed at the time of construction commencement, Beon can confirm that sufficient water was available during vegetation clearing and continues to be utilised for onsite dust suppression and other site activities.

3. Non-compliance No.3 (SSF-IEA-21-NC3): Section 7.5 of the EMS was not implemented in accordance with Schedule 4, Condition 1 of the Development Consent as no evidence of the publication of newspaper advertisements and posting of newsletters and project updates on a prominent community noticeboard in Temora and Junee was identified during the audit.

Recommendation No. 3 (SSF-IEA-21-R3): In response to Non-compliance No. 3, prepare and publish required notifications or amend EMS to document only those stakeholder and community and engagement initiatives that can be reasonably and practicably achieved.

In response to Non-compliance No. 3, Beon has prepared and published a notification in the local newspaper Temora Express on Friday 9th April. Furthermore, this notification was also placed on the community noticeboard in Temora. Moving forward, Beon will review the stakeholder engagement initiatives and ensure that these are reasonably and practicably achieved.

In addition to the above noted non-compliances, the following continual environmental management improvement opportunities were identified during the audit:

- *Section 5.4.2, Table 5-1 and Table 2-2 could be updated in regard to the Fire Safety Study (FSS) to explain that the FSS has not been prepared as battery storage is not being constructed on the Project; and*
- *Review Project phone contact information, that is presented within the EMS and associated management plans to allow community to obtain Project-related information, to ensure the number is consistent in all relevant documentation.*

In response to these improvement opportunities, a review of the EMS and associated management plans will be undertaken.

To discuss these audit findings and responses further, please contact myself, Kirsten Lee at kirlee@beon-es.com.au.

Yours sincerely,

A handwritten signature in blue ink that reads "Kirsten Lee".

Kirsten Lee
Compliance, Sustainability and Stakeholder Lead
Beon Energy Solutions