Prepared for Beon Energy Solutions

Environmental Management Strategy

Quorn Park Solar Farm

November 2024

Project Number: 240084

Document verification

Project Title:	Quorn Park Solar Farm
Project Number:	240084
Project File Name:	240084 Quorn Park EMS Final V5.1

Revision	Date	Prepared by	Approved by
Draft V1.0	21/03/2024	C. Hobbs	J. Love
Draft V2.0	15/05/2024	C. Hobbs	N. Smith
Final V1.0	5/06/2024	C. Hobbs	N. Smith
Final V1.1	7/06/2024	N. Smith (minor updates to consolidated consent)	M. Sutherland
Final V2.0	5/10/2024	Alyce Gill (address DPHI comments)	W. Weir
Final V3.0	24/10/2024	Alyce Gill	N. Smith
Final V4.0	12/11/2024	Alyce Gill	Jane Love
Final V5.0	20/11/2024	Alyce Gill	Jane Love
Final V5.1	26/11/2024	Alyce Gill David Walker (Premise)	Jane Love

Table of contents

FigureS

Tables

Appendices

Acronyms and abbreviations

AC	Alternating current
AHMP	Aboriginal Heritage Management Plan
APZ	Asset Protection Zone
BC Act	*Biodiversity Conservation Act 2016* (NSW)
BCD	Biodiversity, Conservation and Science Directorate
Biosecurity Act	*Biosecurity Act 2015* (NSW)
BMP	Biodiversity Management Plan
BoM	Bureau of Meteorology
CEMP	Construction Environmental Management Plan
CoC	Conditions of Consent
CRAW	Construction Risk Assessment Workshop
CSMP	Community and Stakeholder Management Plan
Cwth	Commonwealth
DC	Direct current
DEMP	Decommissioning Environmental Management Plan
DPHI	Department of Planning, Housing and Infrastructure
DPIE	Department of Planning, Industry and Environment (NSW)
EIS	Environmental impact statement
EMS	Environmental Management Strategy
EP	Emergency Plan
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	Environmental Planning and Assessment Regulation *2021*
EPA	Environment Protection Authority
EPC	Engineering, Procurement and Construction
FSS	Fire Safety Study
FRNSW	Fire Rescue NSW
FTE	Full time equivalent
GMP	Groundcover Management Plan
GWh	Gigawatt Hours
Ha	Hectares
HSE	Health Safety and Environment

HUB	Parkes National Logistics Hub
kL	Kilolitre
km	kilometres
kV	Kilovolts
LGA	Local Government Area
LGCs	Large Generation Certificates
LP	Landscape Plan
m	metres
ML	Megalitre
MW	Megawatt
MWh	Megawatt hours
NEM	National Electricity Market
NSW	New South Wales
OEH	Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
O & M	Operation and Maintenance
POEO Act	*Protection of the Environment Operations Act 1997*
PV	Photovoltaic
RAPs	Registered Aboriginal Parties
REMP	Recommissioning Environmental Management Plan
RET	Renewable Energy Target
RFS	Rural Fire Service
SAP	Special Activation Precinct
SAPs	Sensitive Area Plans
SES	State Emergency Service
SSD	State Significant Development
SWMS	Safe Work Method Statements
TfNSW	Transport for NSW
TMP	Traffic Management Plan
WAD	Works Authorisation Deed

1. Introduction

1.1. Background

Enel Green Power Australia Pty Ltd (EGP, the Proponent) have approval for the construction, operation and reconstruction or decommissioning of an 80 Megawatt (MW) alternating current (AC), photovoltaic (PV) solar farm together with a 20 MW Battery Energy Storage System (BESS) and associated infrastructure, referred to as Quorn Park Solar Farm (the Project). The Project is located on rural land, approximately 10 kilometres (km) northwest of Parkes in the Central West Slopes and Plains of New South Wales (NSW).

The objective of the Project is to use solar PV modules to convert sunlight into carbon free electricity which will be sold in the National Electricity Market (NEM), create Large Generation Certificates (LGC's) which will be sold to liable entities under the *Renewable Energy Act 2000* and produce electricity that will contribute to the Federal Government's Renewable Energy Target (RET) of 33,000 gigawatt hours (GWh) by 2020. The Project will generate an estimated 200,000 megawatt hours (MWh) per year.

The Project was assessed in an Environmental Impact Statement (EIS) in accordance with Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and Schedule 2 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). It is considered State Significant Development (SSD).

The Proponent received approval for the Project on 16 July 2020 from the former Department of Planning, Industry and Environment (DPIE) (now Department of Planning, Housing and Infrastructure (DPHI).

In June 2024 a modification (Mod - 1) was submitted and approved. The modification included:

- Increased BESS duration from one (1) hour to two (2) hours
- Removal of Lot 1 DP717829 from schedule of lands
- An increase from 19 to 22 inverters associated with the proposed solar farm.

Beon Energy Solutions (Beon) have been engaged as the Engineering, Procurement and Construction (EPC) contractor for the Project on behalf of the Proponent for the construction stage, as well as the Operation and Maintenance (O & M) contractor during the operation stage. The Environmental Assessment documents relevant to this Project include:

- The Project EIS (Premise, 2019)
- Submissions Report (Premise, January 2020)
- Amendment Report (Premise, May 2020)
- Modification Application (Premise, 2024)
- DPIE Development Consent (determined 16 July 2020)
- DPIE Consolidated Development Consent (determined 7 June 2024).

The Project will be carried out generally in accordance with the EIS and the Consolidated Conditions of Consent (CoC), if there is any inconsistency between the documents the consolidated conditions of the consent will prevail.

1.2. Purpose of this EMS

This Environmental Management Strategy (EMS) presents the framework for the environmental management for the Project. It has been prepared to outline and describe how the Proponent and its contractors will comply with the environmental assessment and approval during all stages of the Project.

The EMS has been prepared in accordance with:

- DPHI Development Consent (determined 16 July 2020)
- DPHI Consolidated Development Consent (determined 7 June 2024)
- Environmental Assessment documents
- Guideline for the Preparation of Environmental Management Plans (DIPNR, 2004)
- AS/NZS ISO 14001: 2016 Environmental Management systems
- The Proponent and the EPC Contractor's Management System Requirements
- Applicable Federal and State Legislation
- AS/NZS ISO 31000:2009 Risk management.

The purpose of this EMS is to provide a structured approach to the management of environmental issues during all stages of the Project. The EMS outlines the requirements, controls and management procedures that direct the Project team and provides an overall approach to the Project. It also provides requirements for and directs contractors and suppliers for the Project regarding specific measures that they need to adopt for their own work for the Project. Implementing this EMS effectively will ensure that the Project team (across all phases) will meet regulatory and policy requirements in a systematic manner and continually improves environmental performance.

This EMS:

- Describes the Project in detail including activities to be undertaken
- States obligations, objectives and targets for issues that are important to the environmental performance of the Project
- Identifies the approvals, licences and permits that relate to the Project
- Describes the strategic framework for environmental management of the Project
- Describes the environmental management related roles and responsibilities of personnel
- Outlines training and induction requirements for employees, contractors and sub-contractors, in relation to environmental and compliance obligations with applicable policies, approvals, licences, permits, consultation agreements and legislation
- Describes the procedures that will be implemented for community consultation and notification, and complaints management
- Includes protocols for managing and reporting incidents and non-compliances with applicable policies, approvals, licences, permits, consultation agreements and legislation
- Outlines a monitoring regime and inspection program to check the adequacy of controls as they are implemented during construction.

This EMS is the overarching document in the environmental management system for the Project that includes a number of management documents as described in Section 4, and will be implemented by the Proponent once approved by the Secretary. It is applicable to all staff and sub-contractors associated with the Project.

This EMS will be reviewed and updated in accordance with Section 11.1. This includes review and update of the EMS prior to operation and decommissioning and/or recommissioning.

2. Project description

2.1. Location

Situated on a 470 hectare (ha) property located off Back Trundle Road approximately 10 km north-west of Parkes in the Central West Slopes and Plains of New South Wales (refer to Figure 2-1), the development site boundary (development site) contains productive agricultural land supporting dryland farming and grazing. The development site is largely cleared, containing isolated paddock trees and a small, east west aligned windrow of planted trees in the middle of the site. Riparian vegetation associated with Ridgey Creek is located immediately 100 m west of the development site boundary and planted trees along the western half of the southern boundary screens this portion of the property from Back Trundle Road. Ridgey Creek flows southwest into Goobang Creek, a tributary of the Lachlan River. The mean annual rainfall for Parkes is 617.8 millimetres (mm) and mean annual temperature ranging from 9.3°C to 23.0°C.

TransGrid's Parkes Zone Substation is located to the south of the development site boundary, as is the constructed 65 MW Parkes Solar Farm and the 70 MW Goonumbla Solar Farm. The Parkes Activation Precinct (AP) is located to the south-east (formerly known as the Parkes Logistics Hub). The AP (refer to Figure 2-1) offers investment and business development opportunities for new and existing industries, located at the crossroads of the Newell Highway connecting Brisbane and Melbourne, and the transcontinental railway linking the eastern seaboard to Perth. There are twelve non associated residential receivers within 2 km of the Project boundary. The closest non associated residential receivers are depicted in Figure 2-2.

LEGEND

- Development site boundary
- Goonumbla Solar Farm
- Parkes Solar Farm
- Parkes Activation Precinct
- Roads
- Railway
- Waterways

Nanardine Lane
Nanardine
Bogan Road
Mcgrath Lane
Back Trundle Road
Deep Lead
Henry Parkes Way
No Mistake Lane
Goldrush Road
Millers Lookout Road
Shallow Rush
Reedsdale Road
Farrer Street
Mitchell Street
Victoria Street
Brolgan Road
Best Street
The Square
Hartigan Avenue
Coopers Road
London Road
Middleton

0 500 1,000 1,500 m

Datum: GDA94 / MGA zone 55

Quorn Park Solar Farm

Figure 2-1 Project locality

2.2. Scope of works

Works will involve the construction and operation of a ground-mounted PV solar tracking array generating approximately 80 MW AC of renewable energy, together with a 20 MW BESS. The generated electricity will be exported into the network through connection to an Essential Energy 132 kilovolt (kv) line located approximately 700 m to the west of the development site boundary.

Key development and infrastructure components will include:

- Single axis tracking solar arrays with an estimated 161,000 panels mounted approximately 1.4 m off the ground on galvanised frames and posts with the top edge of the panel up to approximately 4 m above ground level at full tilt.
- 22 inverter stations interspersed throughout the arrays, each with a size of a 20 foot shipping container with a height of approximately 2.5 m.
- A substation compound (approximately 70 m x 50 m) containing 132kV transformer, harmonic filter equipment, electrical switch gear and protection equipment, as well as supporting structures for cabling up to approximately 14 m in height
- A BESS consisting of either banks of Lithium-ion batteries with associated ancillary inverter, transformer and air conditioning equipment or containerised battery modules; occupying a footprint of approximately 80 m x 70 m A control room building (approximately 5 m wide x 3.5 m deep x 2.7 m high)
- Chain wire site perimeter fencing (2.4 metre-high)
- Gravel internal maintenance access tracks and vehicle turnaround areas
- Off-site screen plantings for three neighbours who have expressed an interest in this option.

The approved Project layout is provided in Figure 2-2.

The following definitions are used in this EMS and are adopted in subordinate management plans:

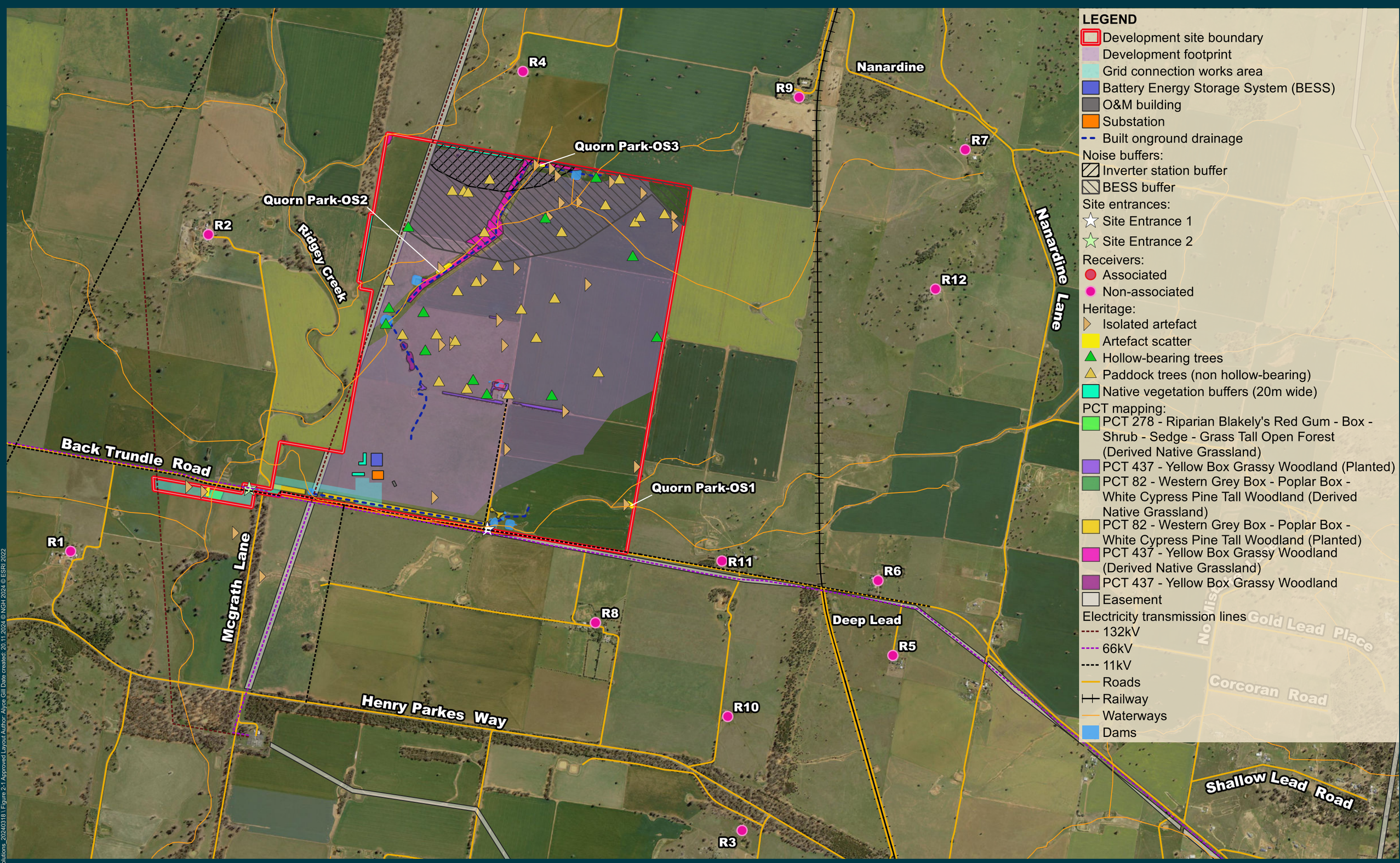
- **Development site boundary** – Includes the full area surveyed during the preparation of the Development Application (including the EIS and Biodiversity Development Assessment Report [BDAR]). The Environment Management Strategy and the various sub plans apply to this area.
- **Development footprint** – The approved development area, as per the consolidated Conditions of Consent (CoC)
- **Final design area** – The portion of land designated for the development of the Project. All Project-related activities, including installation, operation, and maintenance, will take place within these defined boundaries
- **Grid connection area** – The grid connection area, outlined in Appendix 1 - General Layout of Development of the Consolidated Consent, is situated in the southwest portion of the development site boundary.

This EMS is applicable to the development site, as defined in Figure 2-2. The Proponent has overall responsibility for ensuring that no disturbance outside of the final design area (as defined in Figure 2-3) occurs during the construction, operation, recommissioning or decommissioning of the Project. As shown in Figure 2-4, areas outside of the final design area will be protected by the installation of boundary fencing, including:

- A permanent internal fence to be constructed around the majority of the final design area (with the exception of the access road to the visual screens) to the northwest. Internal fencing will be constructed

progressively. Temporary fencing will be used to demarcate the final design area until permanent fencing has been installed

- Flagging tape will be installed around the access road (to the vegetation visual screens) during construction only. Signage will be installed to denote the presence of sensitive environmental areas (e.g. Threatened Ecological Communities). Signs will be clearly visible from a distance of at least 20 m and will be general in nature, for example ‘Restricted access, sensitive environmental area’
- Existing fences occur around the development site boundary (along Back Trundle Road). Where appropriate, these will be utilised as boundary fences during the construction and operation of the Project.



0 500 1,000 1,500 m

Datum: GDA94 / MGA zone 55

NGH

Quorn Park Solar Farm

Figure 2-2 Approved Layout

LEGEND

- Development site boundary
- Approved development footprint
- Final design area
- Grid connection works area

Retained vegetation:

- Remnant
- Planted

Electricity transmission lines

- 132kV
- 66kV
- 11kV

- Roads
- Railway

Waterways:

- 1st - 3rd Order Streams
- 4th Order Stream

RIDGEY CREEK

Back Trundle Road

Mcgrath Lane

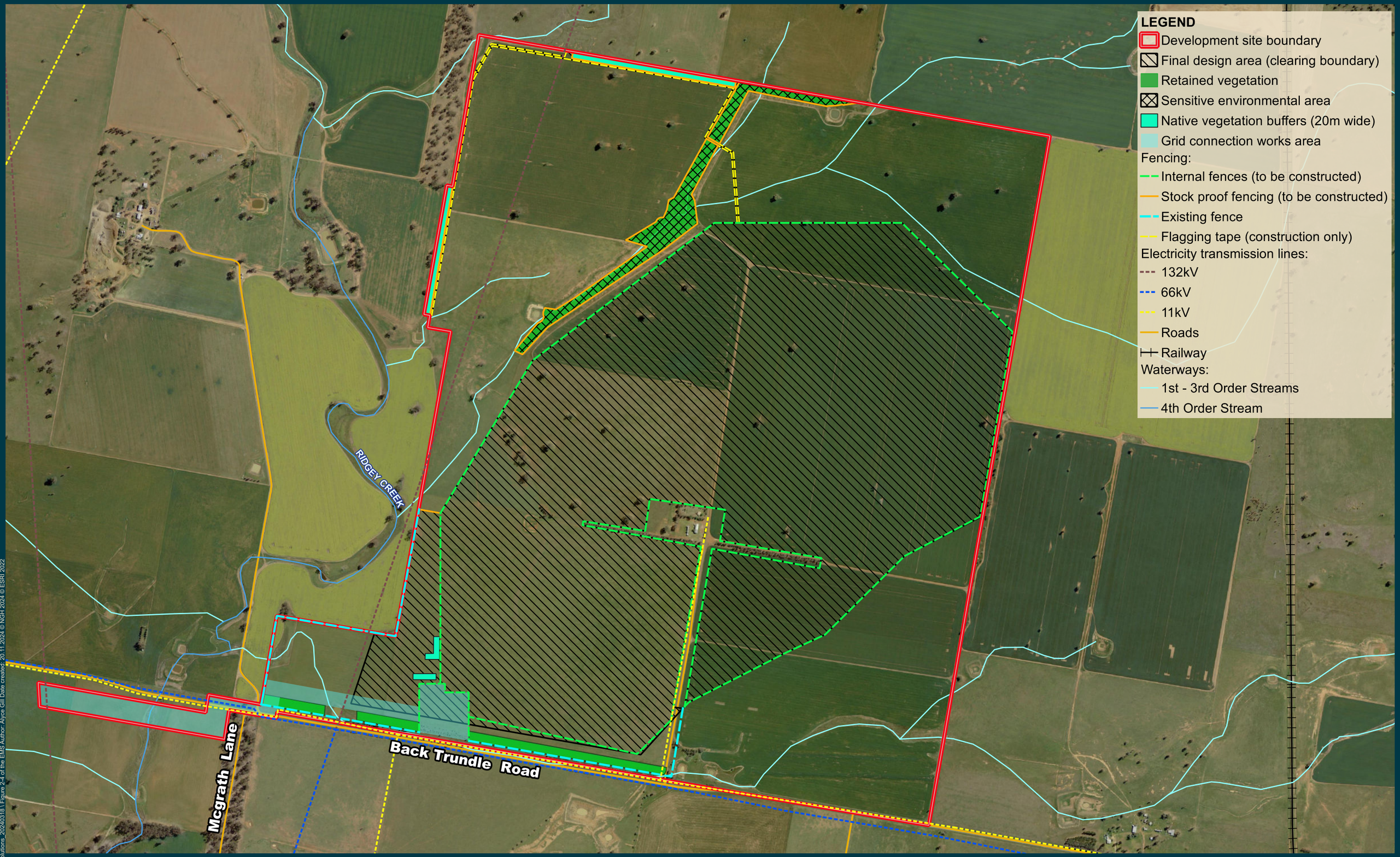
0 500 1,000 1,500 m

Datum: GDA94 / MGA zone 55

NGH

Quorn Park Solar Farm

Figure 2-3 Final design area



Datum: GDA94 / MGA zone 55

NGH

Quorn Park Solar Farm

Figure 2-4 Fencing commitments

2.3. Project programme

An indicative timeline for the Project is outlined in Table 2-1. It is expected that the solar farm will be commissioned at the end of the construction period, which is anticipated to take 12 months.

Table 2-1 Indicative timeline

Phase	Approximate commencement	Approximate duration
Construction	Q4 2024	9 months
Operation	Q3 2026	30 years
Decommissioning	Q3 2056	12 months

2.4. Project design and upgrades

In accordance with Schedule 2 Condition 6 of the Consolidated Development Consent, the Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the *Building Code of Australia*.

The BESS for the Project will not exceed a total delivery capacity of 20 MW as per Schedule 3 Condition 1.

As per Schedule 2 Condition 5, of the Consolidated Development Consent, the Proponent may upgrade the solar panels and ancillary infrastructure on site provided these upgrades remain within the approved development footprint. Prior to carrying out any such upgrades, the Proponent and the EPC Contractor must provide revised layout plans and project details of the development to the Secretary incorporating the proposed upgrades.

As per Schedule 3 Condition 17(a), the Proponent must minimise the potential for offsite visual impacts of the Project. Test results indicate that the external lighting reflectance of the PV modules for the Project is currently below 3%. The visual appearance of ancillary infrastructure will be designed to blend into the surrounding landscape. The project landscaping plan provides for the installation of approved vegetation screening to address residual offsite visual impacts.

2.5. Project staging

As per the definitions in the Project's Consolidated Development Consent, the construction of the Project includes but is not limited to carrying out of any earthworks on site and the construction of solar panels, a BESS and any ancillary infrastructure, but excludes road upgrades or maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying.

The project sequences include pre-construction, construction, operation, recommissioning and decommissioning.

The Project staging and sequencing is provided in Table 2-2 below.

On the 3 September 2024, the applicant requested the secretary's agreement to stage the construction of the project to enable, among other things, construction of the solar farm to commence before all approved road upgrades are completed. The staging breakdown is proposed in part to respond to the necessary project impact footprint changes required as a consequence of detailed design. These changes have necessitated a modification of the consent to expand the impact footprint in relation to the required intersection upgrade works. This modification is currently under assessment by DPHI, with a decision expected in November 2024. The associated Works Authorisation Deed (WAD) from TfNSW, necessary to carry out the intersection upgrade works, is currently under review by TfNSW and is expected to be issued in November 2024.

Emergency Plan, Emergency Services Information Package and Fire Safety Study

On 18 October 2024 DPHI approved a request to stage the Emergency Plan (EP), Emergency Services Information Package (ESIP) and the Fire Safety Study (FSS) under Condition 3(a) and 3C of Schedule 4 of the consent. Refer to Section 9.3 of this EMS for additional information regarding these Plans.

Staging of these Plans will involve the following:

- **Stage 1** – The EP and the ESIP will be developed prior to the commencement of construction of the solar farm. A copy of these plans will be provided to the local Fire Control Centre and Fire and Rescue NSW. This stage is consistent with stages 1a-1d as outlined in Table 2-2
- **Stage 2** – The FSS will be prepared (to the satisfaction of FRNSW and RFS) prior to commencing construction of the BESS. This stage is consistent with stages 1e-3 as outlined in Table 2-2.

Table 2-2 Project staging and sequencing

Stage	Description of works	Notes
1a	Road upgrades or maintenance works to public road network as outlined in the conditions of consent, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying;	• Upgrades to the intersection of McGrath Lane and Henry Parkes Way and the first 100m of McGrath Lane (as outlined in Appendix 3 of the development consent) will be delayed to Stage 1c; and • All other road upgrades are to be completed prior to the commencement of Stage 1b.
1b	Site establishment and commence initial construction of the solar farm including: • Delivery of equipment; • Establishment of compound; • Installation of internal roads; and • Commence construction of the first three rows of solar panels (golden row) for testing purposes.	• Prior to commencement of this stage, all management plans required by the Development Consent are to be approved and implemented as required (or as otherwise agreed with the Planning Secretary). • Heavy vehicles will be restricted to a maximum length of 19m; • Only one heavy vehicle associated with the project is permitted to use the Henry Parkes Way/McGrath Lane intersection at any one time; • Limits on heavy and light vehicles accessing

Stage	Description of works	Notes
		the site and using the Henry Parkes Way/McGrath Lane intersection, will be implemented and monitored, as outlined in the TMP; and • Specific traffic management protocols outlined in the TMP are to be implemented to ensure impacts to the traffic network are minimised.
1c	This stage includes: • Commence construction of the solar farm (beyond Stage 1b initial works); and • Road upgrades to the intersection of McGrath Lane and Henry Parkes Way and the first 100m of McGrath Lane (as outlined in Appendix 3 of the development consent).	• Prior to the commencement and completion of this stage, and in the event of delays to commencement or completion, TfNSW must be notified in accordance with the requirements of the TMP; and • Vehicles greater than 19m in length to be permitted in accordance with a Traffic Guidance Scheme (TGS) that will be in effect in relation to the intersection upgrade works. • At the completion of this stage, TfNSW must be notified in accordance with the requirements of the TMP.
1d	Continued construction of the solar farm	• Commencement of this stage is linked to the completion of all road upgrades required under Condition 5 of Schedule 5 of the Development Consent. • No high risk over-dimensional traffic movements are permitted during this stage.
1e	Continuation of the construction of the solar farm and the transport of high risk over-dimensional heavy vehicles requiring pilot vehicles during construction as described in Condition 2(a) of Schedule 3 of the development consent. This stage includes the installation of the project battery energy storage system.	• Commencement of high risk over-dimensional traffic movements, subject to: ○ Update of the TMP to reflect the outcome of consultation with Council and TfNSW; and ○ The gaining of necessary National Heavy Vehicle Regulator licenses.
2	Operation of the Quorn Park Solar Farm; and	
3	Decommissioning the Quorn Park Solar Farm at end of life.	

2.6. Site access and road upgrades

During all phases of the Project, all vehicular traffic associated with the development will travel to and from the Project via Henry Parkes Way, McGraths Lane, Back Trundle Road, and the approved site access points on Back Trundle Road (refer to Figure 2-2).

Prior to commencing construction, consent must be obtained from PSC as the road authority (with concurrence from TfNSW for those works associated with classified roads) under section 138 of the *Roads Act 1993* for road upgrades identified in Table 2-3 (Appendix 3 of the Consolidated Development Consent) and these works must be implemented. 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 road authority. At the time of preparation of this EMS some of these road upgrade works have been designed, approved and completed, as outlined in Table 2-3.

The Proponent will notify TfNSW of the commencement (or any delays to the commencement or completion) of the Henry Parkes Way / McGrath Lane intersection upgrade and the completion of these works (Stage 1c as per Table 2-2.

Table 2-3 Road upgrades and site access

Road	Location	Upgrade requirements	Relevant stage
McGrath Lane and Henry Parkes Way	Intersection	Basic Right Turn and Basic Left Turn (BAR/BAL) treatment to cater for the largest vehicle accessing the development site boundary (excluding over-dimensional vehicles).	Stage 1c
McGrath Lane	100 m from Henry Parkes Way	Widening of pavement and bitumen seal McGrath Lane to a width of 9 m road formation (8 m sealed with 0.5 m unsealed shoulder on either side) for at least a distance of 100 m from Henry Parkes Way.	Stage 1c
McGrath Lane	100 m from Back Trundle Road	Widening and bitumen seal McGrath Lane to a width of 9 m road formation (8 m sealed with 0.5 m unsealed shoulder on either side) for at least a distance of 100m from Back Trundle Road.	Stage 1a (completed)
Back Trundle Road and McGrath Lane Intersection	Intersection	Construction of Rural Sealed Intersection to cater for the largest vehicle requiring access (excluding over-dimensional vehicles).	Stage 1a (completed)
Back Trundle Road	100 m from McGrath Lane	Widening and bitumen seal Back Trundle Road to a width of 9 m road formation (8 m sealed with 0.5 m unsealed shoulder on either side) for at least a distance of 100 m to the east from McGrath Lane.	Stage 1a (completed)
Back Trundle Road	Site Access Point	Rural Property Access Type.	Stage 1a (completed)

2.7. Decommissioning and Rehabilitation

As per Schedule 3 Condition 30, within 18 months of the cessation of operations, unless the Secretary agrees otherwise, the Proponent must rehabilitate the development site to the satisfaction of the Secretary. The Proponent may prepare a Rehabilitation or Decommissioning Plan in accordance with the rehabilitation objectives listed in Table 2-4.

Table 2-4 Rehabilitation objectives

Feature	Objective
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 (at least Class 4 Land Capability for areas of mapped Biophysical Strategic Agricultural Land).
Community	• Ensure public safety at all times.

2.8. Project hours

As per Schedule 3 Condition 14, road upgrades, construction, upgrading or decommissioning activities will be undertaken between:

- 7.00 am - 6.00 pm Monday to Friday
- 8.00 am - 1.00 pm on Saturdays
- No work on Sundays or 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
- Emergency work to avoid the loss of life, property and/or material harm to the environment.

3. Planning

3.1. Legal and other requirements

A register of legal and other requirements for the Project is contained in Appendix B. This register will be maintained as a checklist throughout all phases of the Project. This register will be reviewed at regular intervals e.g. during management reviews and updated with any applicable changes. Any changes made to the legal requirements register will be communicated by the EPC's Site Health, Safety and Environment (HSE) Advisor or delegate to the wider team where necessary through toolbox talks, specific training and other methods, detailed in Section 7 of this EMS.

3.2. Conditions of Consent

The CoC relevant to this EMS are outlined in Table 3-1 below. The full list of CoCs are identified in Appendix A, along with where the conditions and measures have been addressed.

Table 3-1 Conditions relevant to the EMS

Condition	Requirement	Reference
Schedule 4 Environmental Management and reporting		
Condition 1 Environmental Management Strategy	Environmental Management Strategy 1. Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary in writing. This strategy must:	This Plan
	(a) provide the strategic framework for environmental management of the development;	Section 1.2
	(b) identify the statutory approvals that apply to the development;	Section 3
	(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 4.7
	(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;	Section 8
	(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	Section 4.3 Section 10

Condition	Requirement	Reference
	to the development. Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.	
Condition 2 Revision of Strategies, Plans and Programs	The Applicant must:	Section 11
	(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 7 of Schedule 4; • submission of an audit report under Condition 9 of Schedule 4; or • any modification to the conditions of this consent.	
Condition 3 Updating and Staging of Strategies, Plans or Programs	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. *Notes:* • *While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.* *If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.*	Section 2.5 Section 11
Condition 4 Notification of Department	Prior to commencing the road upgrades, construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department via the Major Projects website portal 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 commencing the relevant stage, and clearly identify the development that would be	Section 8.2.1

Condition	Requirement	Reference
	carried out during the relevant stage.	
Condition 5 Final Layout Plans	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including details on the siting of solar panels and ancillary infrastructure.	Section 6 Detailed Design plans
Condition 6 Work as Executed Plans	Prior to commencing operations or following the upgrades of any solar panels or ancillary structure, the Applicant must submit work as executed plans of the development to the Department via the Major Projects website.	Section 6 Final design plans
Condition 7 Incident notification	The Secretary must be notified via the Major Projects website portal 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.	Section 10.5.1
Condition 8 Non-Compliance Notification	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 non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	Section 10.5.3
Condition 9 Independent Environmental Audit	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 *Independent Audit Post Approval Requirements* (Department, 2020) (or equivalent) 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 by the Secretary: i. Within 3 months of commencing construction ii. Within 3 months of commencement of operations; and iii. As directed by the Secretary a) Be carried out in consultation with the relevant agencies b) Assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and c) 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 three 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	Section 10.3.2

Condition	Requirement	Reference
	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.	
Condition 10 Access to Information	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.	Section 12.3

3.3. Approvals, permits, licensing and agreements

The Project requires the following permits and licences:

- Relevant permits under the Heavy Vehicle National Law (NSW) for the use of over-dimensional vehicles on the road network.
- *Roads Act 1993*, Section 138
  Any works to public or classified roads require consent under this act from the road authority. Parkes Shire Council is the roads authority for Henry Parkes Way, McGraths Lane and Back Trundle Road. NSW Transport for NSW has a concurrence role for classified roads including Henry Parkes Way pursuant to Section 138(2) of the Roads Act.

Should any additional environmental or planning approvals, permits or licences be required the following procedure will be implemented:

- Approval, licence or permit need is identified, the EPC Contractor will notify the Proponent (if applicable).
- The EPC Contractor's or the Proponent's Project Manager will identify impacts to the Project in relation to the approval (e.g. stop work).
- The EPC Contractor's or the Proponent's Project Manager will complete the necessary work to apply for the approval, licence or permit.

If changes are necessary to the EMS, the procedure in Section 11 will be followed.

4. Environmental Management Strategy

This EMS provides the system to manage and control the environmental aspects during all Project phases. It identifies all requirements applicable to activities described in Section 2. The EMS provides the overall framework, system and procedures to ensure the potential for environmental impacts is minimised and legislative requirements are fulfilled. The system and procedures in this EMS have been developed with consideration of the environmental assessment documents and all relevant licences, permits and approvals for the Project. This EMS establishes the system for implementation, monitoring and continuous improvement to minimise impacts from the Project on the environment. Associated documents prepared in accordance with this EMS includes the following:

- Construction Environmental Management Plan (CEMP)
- Operational Environmental Management Plan (OEMP)
- Biodiversity Management Plan (BMP)
- Landscape Plan (LP)
- Aboriginal Heritage Management Plan (AHMP)
- Groundcover Management Plan (GMP)
- Traffic Management Plan (TMP)
- Decommissioning Environmental Management Plan (DEMP).

The CEMP will be prepared and executed by the EPC Contractor during the construction phase and for 30 years of operations. It may include sub-plans aimed at addressing significant environmental aspects and mitigating potential harm to the environment.

Similarly, the OEMP will be developed and implemented by the O & M Contractor, starting from the first year of operations until the project concludes.

In general, both the CEMP and OEMP will cover (but not limited to) various aspects such as spill and contamination response, noise and vibration management, waste management, erosion and sediment control, flood response, surface water management, bushfire management, and ground cover management. The CEMP and OEMP will be developed and reviewed in accordance with the Proponent's internal review and approval processes. Both documents will be prepared in accordance with the EMS.

4.1. Environmental Policy

Construction will be undertaken under the EPC Contractor’s Environmental Policy. The Policy describes the EPC Contractor’s commitment to protecting the environment. This policy and the EPC Contractor’s Policy will be displayed at the site office and communicated to staff and other interested parties via induction and ongoing awareness programs. A copy of the EPC Contractor’s Policy is provided as Appendix C of this EMS.

4.2. Objectives and targets

As a means of assessing environmental performance over the life of the Project, environmental objectives and targets have been established. These objectives and targets have been developed with consideration of key issues identified through the environmental assessment and risk assessment process. The objectives and

targets are consistent with the Project environmental policy and will assist in monitoring whether the commitments of the policy are being met.

The targets are incorporated into relevant environmental management sub-plans.

The performance of the Project against the objectives and targets will be documented in the Project compliance reports and at least on an annual basis as part of the management review.

Environmental objectives and targets for the Project are provided in Table 4-1.

Table 4-1 Environmental objectives and targets

Objective	Target	Measurement Tool	Responsibility
Construction and Operation of the Project in accordance with environmental approvals.	• Compliance with statutory approvals.	Audits, construction compliance reporting, management review.	EPC Contractor
Construction and Operation of the Project in accordance with approved environmental management plans.	• Compliance with EMS and associated Sub-plans • Compliance with relevant environmental procedures including SWMS • Compliance with all monitoring and reporting requirements.	Audits, construction compliance reporting, monitoring, management review.	EPC Contractor
Compliance with all legal requirements during all phases of the Project.	• No regulatory infringements (PINs or prosecutions) • No formal regulatory warning.	Audits, construction compliance reporting, management review (construction and operation).	EPC Contractor O & M Contractor The Proponent
Implement rigorous and comprehensive EMS that meets the requirements of AS/NZS ISO 14001.	• Address non-compliances and corrective actions within specific timeframes.	Audits, management review.	EPC Contractor O & M Contractor The Proponent
Engage with the affected and broader community, minimise complaints and respond to any complaints within a suitable timeframe throughout all phases of the Project	• Disseminate regular Project updates and other information through the Project website and other tools identified in the Project's Community Communication Strategy • Record and respond to complaints in accordance with timeframes specified in the Project's Community Communication Strategy.	Review complaints register, construction compliance report, audits	EPC Contractor O & M Contractor The Proponent
Continuously improve environmental performance throughout all phases	• Develop and maintain a program of ongoing environmental training • Capture lessons learnt from	Construction compliance report, management review, construction and operational audits.	EPC Contractor O & M Contractor The Proponent

Objective	Target	Measurement Tool	Responsibility
of the Project.	environmental incidents to minimise repeat issues • Encourage and reward innovation and effort throughout the works force.		

4.3. Environmental Management sub-plans

The EMS and sub-plan documents are prepared to identify requirements and processes applicable to specific impacts or aspects of the activities described in Section 2 throughout all phases/stages of the Project. They address the measures identified in the environmental assessment documentation (EIS, Submissions Report and Amendment Report) and Project Approval. All management measures will be implemented as required, and within the relevant phases of the Project. If there is any inconsistency between approval documents, the conditions of the approval shall prevail.

The sub-plans for the Project, and their consultation approval requirements, are provided in Table 4-2.

Table 4-2 Environmental management plans, approval and consultation requirements.

Plan	Consultation requirements	Approval requirements
EMS (Schedule 4 CoC 1)	n/a	To the satisfaction of the Secretary
Traffic Management Plan (TMP; Schedule 3 CoC 7)	Developed in consultation with Transport for NSW (TfNSW) and Council	To the satisfaction of the Secretary
Landscaping Plan (Schedule 3 LP; CoC 9)	Developed in consultation with receivers R2 and R4	To the satisfaction of the Secretary
Biodiversity Management Plan (BMP; Schedule 3 CoC 13)	Developed in consultation with Biodiversity, Conservation and Science Directorate (BCD)	To the satisfaction of the Secretary
Aboriginal Heritage Management Plan (AHMP; Schedule 3 CoC 20)	Developed in consultation with Heritage NSW and Aboriginal Stakeholders	To the satisfaction of the Secretary
Fire Safety Study (FSS; Schedule 3 CoC 24)		To the satisfaction of the Secretary and meet the requirements of FRNSW.
Emergency Plan (EP; Schedule	n/a	Be prepared in accordance with the findings of the FSS. Include an

Plan	Consultation requirements	Approval requirements
3 CoC 27)		Emergency Services Information Package to the satisfaction of the FRNSW and RFS.
Groundcover Management Plan (GMP; Schedule 3 CoC 10)	n/a	To be approved by the Proponent
Construction Environmental Management Plan (CEMP) - To be prepared prior to construction commencing	n/a	To be approved by the Proponent
Operations Environmental Management Plan (OEMP) - To be prepared prior to commencing operation	n/a	To be approved by the Proponent
Decommissioning Management Plan (DMP)	n/a	Either a DMP or a RMP would be submitted to DPHI for approval 12 months before the decommissioning or recommissioning is scheduled to occur.
Recommissioning Management Plan (RMP).	n/a	Either a DMP or a RMP would be submitted to DPHI for approval 12 months before the decommissioning or recommissioning is scheduled to occur.

4.3.1. Construction environmental management plan (CEMP)

Prior to construction commencing, a CEMP will be prepared and executed by the EPC Contractor during the construction phase and for the 30 years of operation. The CEMP will be approved by the Proponent. The CEMP will document the environmental procedures and controls that would be implemented throughout construction. The CEMP would describe the role, responsibility, authority and accountability of all key personnel involved in construction and detail all monitoring that would be undertaken. The CEMP would comprise various sub-plans detailing the specific mitigation measures that would be implemented to avoid and manage potential environmental impacts. These would include plans covering biodiversity, Aboriginal heritage, soil and water protection, dust, noise and vibration, waste management, and bushfire prevention.

4.3.2. Operational environmental management plan (OEMP)

An OEMP will be prepared prior to the commencement operation and approved by the Proponent. The OEMP will include procedures, reporting, and the allocation of responsibilities designed to minimise

environmental impacts. The OEMP will document the environmental procedures and controls that would be implemented to operate the solar farm as a responsible rural landowner. The OEMP would comprise various sub-plans detailing the specific mitigation measures that would be implemented to avoid and manage potential environmental impacts and minimise risks. These would include plans covering land management (specifically relating to fuel loads and noxious weeds) and emergency preparedness.

4.4. Consultation

Consultation has been completed in accordance with the requirements of the Project approvals. Consultation has been summarised for the relevant plans in Table 4-2 of this EMS.

4.5. Work Method Statements

Safe work method statements (SWMS) will be prepared by the EPC Contractor for all activities. Where required, these will include activities that carry an inherent level of environmental risk across all phases of the Project. SWMS will be prepared prior to the commencement of relevant construction activities on site and will incorporate relevant mitigation measures and controls from management sub plans. SWMS will be prepared to identify risks, ensure sound environmental practices are implemented, and to minimise the risk of environmental incidents or system failures. SWMS are to be designed to communicate requirements, actions, processes and controls to construction personnel using plans, diagrams and simply written instructions. SWMS will be reviewed and signed off by EPC contractor and the Proponent during the Construction Risk Assessment Workshop (CRAW).

SWMS will be developed for the following activities that include a level of environmental risk (at a minimum):

- Pre-construction activities including topsoil stripping and earthworks.
- Activities that impact on environmentally sensitive areas.
- Vegetation clearing and grubbing.
- Working in or near waterways.
- Site compound and other ancillary facilities establishment.
- Dewatering.
- Topsoil stripping.
- Concreting activities (where required).
- Drainage works.

All Project personnel and sub-contractors undertaking a task governed by a SWMS must participate in training on the SWMS and acknowledge that they have read and understood their obligations prior to commencing work.

Regular monitoring, inspections, and auditing against compliance with the SWMS will be undertaken throughout all phases of the Project by the EPC Contractors, O & M Contractors, Project management, quality, and environmental personnel to ensure that all controls are being followed and that any non-conformances are recorded, and corrective actions implemented.

4.6. Sensitive area plans

To aid in the identification and protection of significant environmental features associated with the Project, a set of Sensitive Area Plans (SAPs) have been prepared and are located in Appendix D.

The sensitive area plans include information relating to (for example):

- Threatened ecological communities
- Watercourses
- Heritage items
- Sensitive receivers.

The SAPs are working documents and will be updated throughout the Project, as required.

4.7. Roles and responsibilities

4.7.1. Environmental management team

The key environmental management roles and responsibilities for the construction and operation phases of the Project are described below (Table 4-3, Table 4-4 and Table 4-5).

EGP is the applicant and Proponent for the Project. The Proponent has overall responsibility for the Project, including compliance with the CoC, the EMS and other Plans. The Proponent has engaged the EPC Contractor to undertake the design, construction activities including pre-construction and operation of the solar farm.

The EPC Contractor shall ensure specific responsibilities are communicated to all personnel via appropriate environmental management training (part of the initial safety and environment induction) throughout all stages of the Project.

Table 4-3 Proponent's Environmental management team

Role	Key responsibilities and accountabilities
Project Manager	• Engaging with all relevant stakeholders and authorities to determine Project environmental requirements; and acquiring Project environmental approvals including relevant licensing and permits • Fulfilling the Proponent's obligations under the Conditions of Consent for the Project works • Providing the contractor visibility and transparency to Project environmental requirements and commitments, to enable outcomes • Advising or enabling environmental requirements and considerations in a timely manner • Initiating and participating in Project meetings, workshops, and consultations to facilitate outcomes throughout the Project • Setting up and managing a Project complaint handling and resolution process, as detailed by the Project CoCs

Role	Key responsibilities and accountabilities
	• Making Project approvals and environmental documents publicly accessible, as detailed by the Project CoCs • Regularly monitoring the EPC environmental performance and maintaining visibility on work sites for environmental compliance • Advising DPHI and Stakeholders on Project environmental performance • Duty to Notify and timely reporting of environmental incidents and non-compliances to the DPHI , and as otherwise required • Ensuring all Project activities are carried out in an environmentally responsible way, without environmental harm, and in compliance with the Project CoCs • Engaging a contract Superintendent that is familiar with the Projects environmental requirements and that in the event of contractual ambiguity or discrepancy an informed interpretation will be made • Advising DPHI and Stakeholders of key timeframes and dates associated with the works. • Validating the capabilities, proficiencies and performance of parties engaged for the works.

Table 4-4 EPC Contractor's environmental management team (construction phase)

Role	Responsibility	Authority	Accountability
EPC Project Director	Ensure appropriate resources are available to comply with all relevant regulatory and project requirements.	Direct that works be stopped immediately where there is an actual or potential risk of environmental harm.	Reports to the Project Owner
EPC Project Manager	• Overall responsibility to execute the engineering, procurement and construction works • Ensure works comply with all relevant regulatory and project requirements • Liaise with Project Owner and regulatory authorities • Exercise a duty of care to the environment • Ensure that all personnel understand, accept, and fully carry out their obligations for environmental protection and that they are adequately trained, instructed and resourced to fulfil their obligations	Direct that works be stopped immediately where there is an actual or potential risk of environmental harm	Reports to the EPC Project Director

Role	Responsibility	Authority	Accountability
	• Seek relevant approvals for any required works or changes to site conditions outside the limits of the applicable project approvals/permits/plans • Assist with environmental compliance audits and incident investigations as required.		
EPC Construction Manager	• Plan and organise works to reduce the risk of adverse environmental impacts • Ensure works comply with all relevant regulatory and project requirements • Exercise a duty of care to the environment • Notify the Project Manager of any required works or changes to site conditions outside the limits of the applicable project approvals/permits/plans to seek the necessary approvals • Assist with the independent environmental audits and any environmental incident investigations as required.	Can direct construction teams and personnel to take reasonable measures to prevent or minimise any material harm to the environment.	Reports to the EPC Project Manager
EPC Site HSE Advisor	• Overall person responsible for managing the environmental aspects of the project • Coordinate environmental monitoring, reviews and audits as required • Ensure works comply with all relevant regulatory and project requirements • Implement EPC's HSE programs • Ensure all personnel have completed a site induction prior to starting work • Exercise a duty of care to the environment • Ensure the EMS, CEMP and associated documents are available to all personnel • Carry out environmental inspections and initiate actions to ensure compliance with stated requirements • Participate in the independent environmental audit • Report on environmental performance at the site • Undertake environmental incident investigations and implement improvement measures.	Can direct construction teams and personnel to take reasonable measures to prevent or minimise any material harm to the environment.	Reports to the EPC Construction Manager

Role	Responsibility	Authority	Accountability
EPC Workers and Subcontractors	• Participate in environmental reviews and audits as required and directed by the EPC Site HSE Advisor, for relevant work areas • Ensure relevant works comply with all relevant regulatory and project requirements • Provide environmental documentation and records for their relevant work areas to EPC Site HSE Advisor • Implement and comply with the applicable environmental management measures • Report on environmental performance for relevant work areas. • Report any environmental incidents (potential and/or actual) in a timely manner.	Identify and treat environment risks before commencing works each day and prevent any material harm to the environment.	Reports to the EPC Construction Manager

Table 4-5 EPC Contractor's environmental management team (operational phase)

Role	Responsibility	Authority	Accountability
Operation and Maintenance (O & M) Service Operations Manager (Off-Site)	• Ensure appropriate resources are available to comply with all relevant regulatory and project requirements.	Direct that works be stopped immediately where there is an actual or potential risk of environmental harm	Reports to the Project Owner
O & M Site Service Manager (On-Site)	• Plan and organise operations to reduce the risk of adverse environmental impacts • Ensure operations comply with all relevant regulatory and project requirements • Exercise a duty of care to the environment • Notify the Service Operations Manager of any required operations or changes to site conditions outside the limits of the applicable project approvals/permits/plans to seek the necessary approvals • Assist with environmental audits and environmental incident investigations as required	Can direct construction teams and personnel to take reasonable measures to prevent or minimise any material harm to the environment	Reports to the O & M Service Operations Manager

Role	Responsibility	Authority	Accountability
O & M Service HSE Advisor (Off-Site)	• Provides environmental advice and support to the Site Service Manager • Assist with environmental monitoring, reviews and audits as required • Monitors environmental performance for the Project • Assist with environmental incident investigations.	Can direct operations teams and personnel to take reasonable measures to prevent or minimise any material harm to the environment	Reports to the O & M Service Operations Manager
O & M Site Service Team	• Participate in environmental reviews and audits as required for relevant service areas • Ensure servicing comply with all relevant regulatory and project requirements • Provide environmental documentation and records for relevant service areas • Implement and comply with the applicable environmental management measures • Report on environmental performance for relevant service areas • Report any environmental incidents (potential and/or actual) in a timely manner.	Identify and treat environmental risks before commencing works each day and prevent any material harm to the environment	Reports to the O & M Site Service Manager

4.7.2. Sub-contractor management

Sub-contractor personnel are considered equivalent to the EPC contractors Project personnel in all aspects of environmental management and control. Their responsibility in this respect mirrors those of the EPC contractor personnel. They will be required to comply in full with the requirements of the EMS and relevant environmental requirements as it applies to site environmental management and control for all phases of the Project.

In accordance with the subcontractor's HSE Document Approval Process, subcontractors will be appointed and reviewed to determine suitability. Specifically, this process ensures that the EPC Contractors' SWMS and Job Safety Analysis (JSA) have been assessed and are appropriate for the tasks being conducted.

The Project Manager for all phases of the Project is responsible to ensure the subcontractor documentation, plant and equipment has been approved prior to commencing on site.

All employees, workers, contractors and subcontractors working on the Project across all phases will be required to:

- Undertake environmental and heritage awareness training (refer to Section 7)
- Observe sub-contract and statutory requirements relating to environmental protection and other environmental legislation and to follow instructions issued by the EPC Contractor's management and supervisory personnel
- Nominate representatives to liaise with EPC Contractor representatives with respect to, and take responsibility for, environmental requirements for activities
- Adhere to the EPC Contractor's and O & M Contractor's environment management system as it applies to their construction and operations within the development site
- Undertake weekly environmental inspections of their work areas (refer to Section 10)
- Co-operate fully with the site emergency incident procedures and consultative arrangements
- Follow procedures incorporated in the EMS.

All subcontractors are monitored on site for compliance in the same manner as the EPC Contractor's employees. Monitoring will include but is not limited to:

- Undertaking daily checks of environmental controls in high-risk sites or in environmentally sensitive environments
- Documenting findings on daily checks and identifying mitigation measures for implementation
- Completing checklist as required.

Observations will be made by the Site HSE Advisor to assess the effectiveness of environmental protective measures being used onsite by the subcontractor and to determine compliance with the requirements of the EMS.

Internal audits will also be conducted by the Proponent to assess:

- Communication with subcontractors
- Compliance with contractual requirements
- Knowledge of and compliance with the EMS
- Work procedures and environmental management controls on site.

5. Environmental risk assessment

The management of environmental impacts for the Project will follow a risk-based approach to determine the severity and likelihood of an activity's impact on the environment and to prioritise its significance. It will be undertaken via the Project HSE risk assessment prior to commencement of construction, and reviewed and updated where relevant, throughout each phase of the Project. This process considers potential regulatory and legal risks also taking into consideration the concerns of community and other stakeholders.

Risk assessments will be undertaken at various stages of the Project and documented in SWMS and other Project documents. The objectives of these risk assessments are to:

- Identify activities, events or outcomes that have the potential to adversely affect the local environment and/or human health/property
- Qualitatively evaluate and categorise each risk item
- Assess whether risks can be managed by environmental protection measures
- Qualitatively evaluate residual risk with implementation of measures.

The EPC Contractor will maintain the environmental risk register to address risks specific to the scope during the construction and operational phase of the project. Risks will be required to be reviewed on a regular basis and will also be reviewed in response to incidents, changes in legal requirements, change in Project scope, findings of inspections and audits and management reviews.

6. Environmental mitigation measures

Table 6-1 outlines the environmental management and mitigation measures to be implemented for the Project. Mitigation measures are based on Environmental Approval documentation, including the Project's Consolidated Development Consent.

Table 6-1 Project environmental management and mitigation measures for implementation

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
GENERAL					
EMS1	As detailed design progresses, equipment suppliers selected, and the solar farm infrastructure layout is refined, consultation will be undertaken with both the RFS and FRNSW. The intention of this consultation will be twofold. • To provide detail on the technology proposed (e.g. the energy storage system to be installed) and the proposed farm layout to allow (if necessary) design refinement to incorporate any specific requirements the RFS/FRNSW may have • To provide the requisite information that will be needed to prepare an EP.	Design plans	Design	Proponent Project Manager (PM) EPC PM	Project EIS
EMS2	In terms of design principles to minimise risk, the farm layout will be designed to: • Include at least a 10 m defendable space around the perimeter of the solar array area and battery storage facility that permits unobstructed vehicle access • Assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the development site footprint • Complies with the relevant asset protection requirements in the RFS *Planning for Bushfire Protection 2019* (or equivalent) and *Standards for Asset Protection Zones* • Manages defendable space and solar array areas as an Asset	Design plans	Design	Proponent PM EPC PM	Schedule 3 CoC 26 Project EIS

<table>
<tr><th>ID</th><th>Measure/Requirement</th><th>Actions for implementation</th><th>When to implement</th><th>Responsibility</th><th>Reference</th></tr>
<tr><td></td><td>Protection Zone
• Ensure that appropriate access, egress and manoeuvrability within the solar farm is provided for first responders
• Provide for ongoing management and maintenance of bush fire protection measures
• Ensure that services are adequate to meet the needs of firefighters.</td><td></td><td></td><td></td><td></td></tr>
<tr><td>EMS3</td><td>Prior to commencing construction, the Proponent must retire biodiversity credits of a number and class specified in Table 1 and Table 2 of the Consolidated Development Consent (provided below), unless the Secretary agrees otherwise.
The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme and can be achieved by:
• Acquiring or retiring 'biodiversity credits' within the meaning of the Biodiversity Conservation Act 2016
• Making payments into an offset fund that has been developed by the NSW Government
• Funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme.
Table 1: Ecosystem Credit Requirements
<table><tr><th>Vegetation Community</th><th>PCT ID</th><th>Credits Required</th></tr><tr><td>Western Grey Box – Poplar Box – White Cypress Pine tall woodland on red loams mainly of the eastern Cobar Peneplain Bioregion</td><td>82</td><td>11</td></tr><tr><td>Riparian Blakeley's Red Gum – Box Scrub – Sedge grass tall open forest of the Central NSW South Western Slopes Bioregion</td><td>278</td><td>1</td></tr><tr><td>Yellow Box Grassy Woodland on lower hillslopes and valley flats in the Southern NSW Brigalow Belt South Bioregion</td><td>437</td><td>80</td></tr></table>
Table 2: Species Credit Requirements
<table><tr><th>Species Credit Species</th><th>Credits Required</th></tr><tr><td>Sloane's Froglet (Crinia sloanei)</td><td>1</td></tr><tr><td>Brush-stone Curlew (Burhinus grallarius)</td><td>3</td></tr></table></td><td>BMP</td><td>Pre-construction</td><td>Proponent PM
EPC PM</td><td>Schedule 3 CoC 12</td></tr>
</table>

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
EMS4	To ensure potential environmental impacts are avoided, minimised and managed through the adoption of mitigation measure, the following plans will be developed and implemented during the relevant stages of the Project: • Construction Environmental Management Plan (CEMP) • Operations Environmental Management Plan (OEMP) • Decommissioning Management Plan (DMP) • Recommissioning Management Plan (RMP).	CEMP OEMP DMP RMP	All stages	Proponent PM EPC PM	Project EIS
EMS5	The Proponent and the EPC Contractor must ensure that all plant and equipment used on site, or in connection with the development, is: • Maintained and operated in a proper and efficient manner and condition • Operated in accordance with the manufacturer's specifications.	CEMP OEMP	All stages	Proponent PM EPC PM	Schedule 2 CoC 9
EMS6	The Proponent and the EPC Contractor must maintain the agricultural land capability of the development site footprint, including: • Establishing the ground cover within 3 months following completion of any construction or upgrading • Properly maintaining the ground cover with appropriate perennial species and weed management • Maintaining grazing within the development footprint, where practicable unless the Secretary agrees otherwise in writing.	GMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 10

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
EMS7	Unless the Proponent and the applicable authority agree otherwise, the Proponent must: • Repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and • Relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. This doesn't not apply to the upgrade and maintenance of the road network, which is addressed in the Project Traffic Management Plan (TMP).	CEMP	All stages	Proponent PM EPC PM	Schedule 2 CoC 8
EMS8	All contractors undertaking any works on-site will, before commencing works, will undertake relevant inductions	Section 7	All stages	Proponent PM EPC PM	EIS
EMS9	Prior to commencing construction, the Applicant must prepare and implement the Environmental Management Strategy	This Plan	All stages	Proponent PM EPC PM	Schedule 4 CoC 1
EMS10	The Proponent 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 7 of Schedule 4; • submission of an audit report under Condition 9 of Schedule 4; or • any modification to the conditions of the Consolidated Development Consent.	Section 11	All stages	Proponent PM EPC PM	Schedule 4 CoC 2
EMS11	With the approval of the Secretary, the Proponent may: • Submit any strategy, plan or program required by this consent on a progressive basis	Section 11	All stages	Proponent PM EPC PM	Schedule 4 CoC 3

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
	• Submit revised strategies, plans or programs to the Secretary for approval • Prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.				
EMS12	Prior to commencing the road upgrades, construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department via the Major Projects website portal 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 commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	TMP	Pre-construction	Proponent PM	Schedule 4 CoC 4
EMS13	Prior to commencing construction, the Proponent must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including details on the siting of solar panels and ancillary infrastructure.	Design plans	Pre-construction	Proponent PM	Schedule 4 CoC 5
EMS14	The Applicant must ensure that the development is constructed in accordance with the Final Layout Plans.	Design plans	Pre-construction	Proponent PM	Schedule 4 CoC 8
EMS15	Prior to commencing operations or following the upgrades of any solar panels or ancillary infrastructure, the Proponent must submit work as executed plans of the development to the Department via the Major Projects website.	Design plans	Prior to operations	Proponent PM	Schedule 4 CoC 6
EMS16	The Secretary must be notified via the Major Projects website portal immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development	Section 9	All stages	Proponent PM	Schedule 4 CoC 7

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
	application number and the name of the development if it has one) and set out the location and nature of the incident.				
EMS17	The Department must be notified in writing via the Major Projects website portal within 7 days after the Proponent becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	Section 9	All stages	Proponent PM	Schedule 4 CoC 8
EMS18	Independent Audits of the development will be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; (b) within 3 months of commencement of operations; or, (c) as directed by the Secretary.	Section 10	Construction Operations	Proponent PM	Schedule 4 CoC 9
EMS19	Proposed independent auditors will be endorsed by the Secretary, prior to the commencement of an Independent Audit.	Section 10	Construction Operations	Proponent PM	Schedule 4 CoC 9
EMS20	Unless the Secretary agrees otherwise, Independent Audits will: • Be carried out in consultation with the relevant agencies • Assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and	Section 10	Construction Operations	Proponent PM	Schedule 4 CoC 9

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
	• Recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.				
EMS21	Within three months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report will 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 will be implemented to the satisfaction of the Secretary.	Section 10	Construction Operations	Proponent PM	Schedule 4 CoC 9
EMS22	The Proponent will make the following up to date 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	Project website	All stages	Proponent PM	Schedule 4 CoC10

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
	• Any other matter required by the Secretary.				
ABORIGINAL HERITAGE					
EMS23	An Aboriginal Cultural Heritage Management Plan (HMP) will be prepared in consultation with the RAPs. The HMP will include the protocols for surface artefact salvage and site protection.	AHMP	Pre-construction	Proponent PM EPC PM	EIS
EMS24	Recorded sites that could be impacted during construction/operation will be salvaged under the methodology set out in the AHMP	AHMP	Construction and Operation	Proponent PM EPC PM	EIS
EMS25	Sites that are able to be avoided will be clearly identified in the field and shown on plans to avoid inadvertent impacts	AHMP	All stages	Proponent PM EPC PM	EIS
EMS26	If further Aboriginal objects or human skeletal remains are noted during works the Chance Finds Protocol will be followed.	Unexpected Finds Protocol (Appendix E)	All stages	Proponent PM EPC PM	EIS
EMS27	Prior to commencing construction, the Proponent must prepare a Heritage Management Plan	AHMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 20
SOIL RESOURCE MANAGEMENT					
EMS28	Undertake 0-15 cm soil testing to provide a detailed map to inform lime application rates and ascertain the need or not for gypsum treatment if there is a sulphur deficiency.	GMP	Pre-construction	Proponent PM EPC PM	EIS
EMS29	Apply lime to provide an enhanced capacity to establish and maintain groundcover. If possible, use non-inversion cultivation at a depth of 15 cm to thoroughly mix the lime with acidic topsoil.	GMP	Pre-construction	Proponent PM EPC PM	EIS
EMS30	Establish and maintain perennial pasture that includes a balanced mix of grasses, legumes and herbs. Establishment of the pasture prior to installation (where practicable) will assist minimise that risk of soil erosion associated with construction soil surface disturbance.	GMP	Pre-construction	Proponent PM EPC PM	EIS

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
EMS31	Where possible, restrict traffic to clearly defined tracks, rather than having random unguided traffic creating compaction over a large proportion of the land within the development site boundary	CEMP / TMP	Construction	Proponent PM EPC PM	EIS
EMS32	Minimise serious soil compaction by restricting construction activities during wet weather.	CEMP	Construction	Proponent PM EPC PM	EIS
EMS33	Where deep trenching occurs for cable installation, aim to refill the trenches with subsoil first then topsoil.	CEMP	Construction	Proponent PM EPC PM	EIS
EMS34	Although fire hazards need to be minimised, it is desirable that 100% groundcover be maintained through conservative sheep grazing practices (or slashing) so that erosion risk is minimised. The use of pasture species that create food/seed for burrow-creating soil fauna (eg. Ants) will provide extra vertical bio-pores that will assist with water entry and subsoil aeration. The pasture beneath and near solar panels should only be grazed when the soil is dry and firm enough to avoid compaction via sheep trampling.	GMP	Operations	Proponent PM EPC PM	EIS
EMS35	Compaction from vehicles associated with solar panel dismantling and removal (and from traffic associated with the operational phase) would have to be removed via non-inversion chisel ploughing.	DMP	Decommissioning	Proponent PM EPC PM	EIS
EMS36	An OEMP will be prepared prior to the QPSF commencing operation.	OEMP	Prior to operations	Proponent PM EPC PM	EIS
EMS37	One year prior to the commencement of decommissioning activities a Decommissioning Management Plan (DMP) would be prepared in consultation with the landholder and submitted for approval by DPHI.	DMP	Decommissioning	Proponent PM EPC PM	EIS
EMS38	All above ground infrastructure will be removed and decommissioning	DMP	Decommissioning	Proponent PM EPC PM	EIS
EMS39	Soil samples will be collected from those same representative sites from which samples were collected prior to construction and then triennially	GMP	All stages	Proponent PM	EIS

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
	during the farm's operational life to validate the health of the soil resource and the associated cropping/grazing productivity of the property.			EPC PM	
EMS40	The Landscaping Plan will be prepared prior to construction start and will include a program to monitor and report on the effectiveness of these measures and include details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions.	LMP	Pre-construction	Proponent PM EPC PM	EIS
TRAFFIC MANAGEMENT					
EMS41	A Traffic Management Plan (TMP) will be developed in consultation with the Parkes Shire Council and Roads and TfNSW prior to the commencement of construction. The TMP will identify and provide management strategies to manage the impacts of projected related traffic.	TMP	Pre-construction	Proponent PM EPC PM	EIS
NOISE AND VIBRATION					
EMS42	Utilise broad band reversing alarms on all mobile plant and equipment.	CEMP OEMP	All stages	Proponent PM EPC PM	EIS
EMS43	Noise generated by any construction, upgrading or decommissioning activities on site will be managed in accordance with the best practice requirements outlined in the Interim Construction Noise Guideline (DECC, 2009), or its latest version	CEMP	Pre-construction Construction	Proponent PM EPC PM	Schedule 3 CoC 15
EMS44	Examining different types of machines that perform the same function and compare the noise level data to select the least noisy machine.	CEMP OEMP	All stages	Proponent PM EPC PM	EIS
EMS45	Select quieter items of plant and equipment where feasible and reasonable	CEMP OEMP	All stages	Proponent PM EPC PM	EIS
EMS46	Operate plant in a quiet and efficient manner.	CEMP OEMP	All stages	Proponent PM EPC PM	EIS

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
EMS47	Reduce throttle setting and turn off equipment when not being used.	CEMP OEMP	All stages	Proponent PM EPC PM	EIS
EMS48	Regular inspection and maintenance of equipment to ensure it is in good working order.	CEMP OEMP	All stages	Proponent PM EPC PM	EIS
EMS49	Attended noise monitoring will be undertaken in response to a complaint or in the case of an identified concern of potential exceedance.	CEMP OEMP	All stages	Proponent PM EPC PM	Best practice
SOIL AND WATER					
EMS50	The Proponent (and its Contractors) will ensure there is sufficient water for all stages of the development, and, if necessary, adjust the scale of the development to match the available water supply.	CEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 21
EMS51	A Soil and Water Management Plan will be prepared that complies with Managing Urban Stormwater: Soils and Construction, 4th Edition (Landcom, 2004), and in consultation with DPI – Water.	CEMP	Construction	Proponent PM EPC PM	EIS
EMS52	The Proponent (and its Contractors) will ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	CEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 22
FUEL AND CHEMICAL STORAGE AND MANAGEMENT					
EMS53	Storage, handling and use of any potentially hazardous materials (eg. fuel) would be in accordance with the WorkCover NSW Guideline for *Storage and Handling of Dangerous Goods (2005).*	CEMP	All stages	Proponent PM EPC PM	EIS
EMS54	Activities with the potential for spills (refuelling) will not be undertaken within 50 m of any of the farm dams and a suitable spill response and containment kit will be available on site whenever and wherever this type of higher risk activity is undertaken.	Spill Kit CEMP	All stages	Proponent PM EPC PM	EIS
WASTE MANAGEMENT					

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
EMS55	A Waste Management Sub-Plan will be prepared and form part of the CEMP prior to construction commencing. This sub-plan will include tracking of all waste leaving the Development footprint, identifying the waste classification, quantities and fate of materials to be recycled or disposed of.	CEMP	Prior to construction	Proponent PM EPC PM	EIS
EMS56	Suitable waste disposal locations will be identified and used to dispose of litter and other wastes on-site. Suitable containers are to be provided for waste collection.	CEMP	All stages	Proponent PM EPC PM	EIS
EMS57	Work sites are to be kept free of rubbish and cleaned up at the end of each working day.	CEMP	All stages	Proponent PM EPC PM	EIS
EMS58	All waste that cannot be recycled is to be disposed at a legally operating waste facility.	CEMP	All stages	Proponent PM EPC PM	EIS
EMS59	No waste is to be burnt or buried on-site.	CEMP	All stages	Proponent PM EPC PM	EIS
EMS60	All opportunities for recycling will be implemented with the goal of minimising the waste generated by construction.	CEMP	All stages	Proponent PM EPC PM	EIS
EMS61	All waste is to be classified in accordance with the EPA's *Waste Classification Guidelines* and stored and handled in accordance with its classification.	CEMP	All stages	Proponent PM EPC PM	EIS
EMS62	All waste is to be removed from the Development footprint as soon as practicable, and ensure it is sent to appropriately licensed waste facilities for disposal.	CEMP	All stages	Proponent PM EPC PM	EIS
BUSHFIRE PREVENTION					
EMS63	Prepare and adhere to Emergency Plan (EP).	EP	Prior to operations	Proponent PM EPC PM	EIS

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
EMS64	Prior to commencing construction, the Proponent must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development and provide a copy of the plan to local Fire Control Centre and Fire and Rescue NSW.	EP	Prior to operations	Proponent PM EPC PM	Schedule 3 CoC 27
EMS65	Prior to commencing construction of the battery storage facility, the Proponent must prepare and submit a Fire Safety Study for the development in consultation with the RFS and FRNSW, and to the satisfaction of the Secretary.	EP	Prior to operations	Proponent PM EPC PM	Schedule 3 CoC 24
WEED MANAGEMENT					
EMS66	To minimise weed impacts, all machinery, equipment, and vehicles brought onto a property would be free of soil, seed or plant material, and any declared noxious weeds must be managed consistent with the *Biosecurity Act 2015.*	BMP	All stages	Proponent PM EPC PM	EIS
AIR QUALITY					
EMS67	Limit the area of soil disturbance at any one time.	CEMP OEMP	All stages	Proponent PM EPC PM	EIS
EMS68	Place and maintain all disturbed areas, stockpiles and handling areas in a manner that minimises dust emissions (including windblown, traffic-generated or equipment generated emissions).	CEMP OEMP	All stages	Proponent PM EPC PM	EIS
EMS69	Daily visual inspections will be conducted for dust.	CEMP OEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 16
EMS70	Where required, utilise dust suppression	CEMP OEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC16 EIS
EMS71	Where required, minimise vehicle movement and speed.	CEMP OEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 16

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
					EIS
EMS72	Avoid dust generating activities during windy and dry conditions.	CEMP OEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 16 EIS
EMS73	Ensure all construction plant and equipment are operated and maintained to manufacturer's specifications in order to minimise exhaust emissions.	CEMP OEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 16 EIS
EMS74	Restricting vehicle movements and ground disturbance to the minimum area that is safely practicable.	CEMP OEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 16 EIS
EMS75	If necessary, temporary cessation of some works during excessively dry and windy conditions.	CEMP OEMP	All stages	Proponent PM EPC PM	Schedule 3 CoC 16 EIS
TRAVELLING STOCK RESERVE (TSR)					
EMS76	Prior to and throughout construction regular consultation will be undertaken with the Central West Local Land Services (CWLLS) so both parties are fully aware of their uses of McGraths Lane and the TSR.	CSMP	All stages	Proponent PM EPC PM	EIS
EMS77	The TSR would not be used to stockpile any materials associated with the QPSF.	CSMP	All stages	Proponent PM EPC PM	EIS
EMS78	Construction work will not take place at night, avoiding the potential for either light or noise impacts on resting cattle at night.	CSMP	Construction	Proponent PM EPC PM	EIS
LIGHTING					
EMS79	The Proponent (and its Contractors) will implement measures (as required) to minimise the visual impacts of the development, including the potential for any glare or reflection.	Design plans	All stages	Proponent PM EPC PM	Schedule 3 CoC 17

ID	Measure/Requirement	Actions for implementation	When to implement	Responsibility	Reference
EMS80	The visual appearance of all ancillary infrastructure (including paint colours) will be designed to blend in (as far as possible) with the surrounding landscape.	Design plans	Pre-construction	Proponent PM EPC PM	Schedule 3 CoC 17
EMS81	The Proponent (and its Contractors) will not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Design plans	All stages	Proponent PM EPC PM	Schedule 3 CoC 17
EMS82	The Proponent will minimise the off-site lighting impacts of the development.	Design plans	All stages	Proponent PM EPC PM	Schedule 3 CoC 18
EMS83	The Proponent will ensure that any external lighting associated with the development: • Is installed as low intensity lighting (except where required for safety or emergency purposes); • Does not shine above the horizontal; and • Complies with Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.	Design plans	All stages	Proponent PM EPC PM	Schedule 3 CoC 18
EMS84	Visual screens, consisting of native vegetation, will be planted and maintained in accordance with the Landscaping Plan.	Landscaping Plan	All stages	Proponent PM EPC PM	Schedule 3 CoC 17

7. Training, awareness and competency

To ensure that this EMS is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this EMS throughout all phases of the Project. The EPC Site HSE Advisor will coordinate the environmental training in conjunction with other training and development activities (e.g. safety). All training requirements shall be maintained in a training matrix by the EPC Contractor's site team. The matrix shall detail the minimum training requirements for activities, details regarding each worker on site and their completed trainings and competency assessments and licenses, and expiry dates of licenses and training certificates where applicable.

7.1. Environmental induction

Prior to working on site during all phases of the Project, all personnel and subcontractors will undertake an environmental induction as part of the site induction. This is done to ensure all personnel involved in the Project are aware of the requirements of the EMS and to ensure the implementation of environmental management measures.

Short-term visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times.

The EPC Project Manager is responsible to ensure that all employees and contractor employees attend an induction prior to starting work.

The environment section of the induction covers core issues including (but not limited to):

- Relevant details of the EMS including purpose and objectives
- Requirements of due diligence and duty of care
- Conditions of environmental licences, permits and approvals
- Potential environmental emergencies on site and the emergency response procedures
- Reporting and notification requirements for pollution and other environmental incidents or reportable events, including identification of contaminated land and damage and maintenance to environmental controls
- High risk activities and associated environmental safeguards
- Controls when working in or near environmentally sensitive areas
- Specific environmental management requirements and responsibilities as per Section 4.8
- Mitigation measures for the control of environmental issues
- Incident response, communication and reporting requirements as per Section 9.5
- The existence of SWMS for high-risk activities
- Information relating to the location of environmental constraints
- Site specific issues including:
    - Site flagging protocol around environmentally sensitive areas, and exclusion zones
    - Erosion and sediment controls, water quality controls and sediment basin management
    - Management of contaminated material
    - Groundwater and surface water management and controls
    - Obligations under the *Biosecurity Act 2015* to prevent the spread of weeds during construction
    - Responsibilities under the following legislation and permits:

    - *National Parks and Wildlife Act 1974*, including the need to cease. work immediately and report any object of potential Aboriginal heritage unearthed during clearing, grubbing and earthworks operations
    - *Protection of the Environment Operations Act 1997*
  - Noise, vibration and air quality management controls
  - Requirement to maintain surrounding property access for residences, business owners, and their visitors, and to minimise disruptions to these properties for the duration of construction
  - Location of refuse bins, washing, refuelling and maintenance of vehicles, plant and equipment
  - Waste minimisation and disposal protocols
  - Boundaries for vegetation clearing, fauna and fauna habitat management, including awareness of threatened fauna species and fauna rescue o Incident management processes
  - Environmental emergencies including pollution incidents, floods and bushfires
- Key environmental issues e.g. waste management
- Site-specific training will be provided to personnel engaged in activities or areas of higher risk, including but not limited to:
  - Working in and near waterways
  - Construction noise management
  - Areas of Aboriginal heritage sensitivity including unexpected finds procedure, buffer zones and site boundaries.

The site induction will also include communications training including:

- How to respond to community queries
- Aware and abide by the requirements for the release of information
- Understand the identity of the community.

A record of all environment inductions will be maintained and kept on-site in hard copy or in database. The EPC Site HSE Advisor may not authorise amendments to the induction at any time without prior consent or approval from the Proponent. Possible reasons for changes to the induction may be Project modifications, legislative changes or amendments to this EMS or related documentation.

An induction register is kept on site throughout all phases of the Project, as part of Project Quality System to demonstrate compliance with EMS activities.

7.2. Toolbox talks, training and awareness

7.2.1. Toolbox talks

Toolbox talks will be one method of raising awareness and educating personnel on issues related to all aspects of construction including environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction. Toolbox talks may include, but not be limited to:

- A description of the activity and the area
- Identification of the environmental issues and risks for the area
- Outline the mitigation measures for the works and the area
- Details of SWMS for relevant personnel.

Toolbox talks will also be tailored to specific environmental issues relevant to upcoming works. Relevant environmental issues include (but are not limited to):

- Erosion and sedimentation controls
- Working hours
- Emergency and spill response
- Weed management
- Water management
- Construction noise management
- Working in or near waterways
- Dust control
- Vegetation trimming and clearing
- Waste storage and segregation
- Management of previously unidentified heritage items.

Toolbox attendance throughout all phases of the Project is mandatory, and attendees of toolbox talks are required to sign an attendance form and the records maintained. In addition to this, it is expected that the EPC Contractor host a mandatory weekly toolbox meeting.

As required, targeted environmental training will be provided for nominated personnel throughout relevant phases of the Project.

All environmental monitoring and testing are to be conducted by persons who are appropriately qualified and trained.

If the Environmental compliance is not being met in full on site, the Proponent shall retain the right to request dedicated HSE-meetings with the EPC Contractors (at the Contractor's expense), to resolve any pending non-compliances on site, and aim to see the EPC Contractor resolve pending issues in a practicable way.

7.2.2. Environmental awareness training

Prior to commencement, and throughout all phases of the Project, the EPC Contractor and subcontractors working on site will be provided with environmental training that will be integrated into their site inductions, toolboxes and other site communications such as pre-starts, campaigns, workshops etc. Formal qualifications for specialist staff may be required in relation to activities such as animal handling and the design of erosion and sedimentation control plans. The aim will be to achieve a level of awareness and competence appropriate to their assigned activities.

Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact.

This training will generally be prepared and delivered by the EPC Site HSE Advisor throughout all phases of the Project. The target groups and suggested topics for this training are detailed in Table 7-1.

Another way to inform construction personnel will be through the development and distribution of awareness notes. These will typically take the form of a poster, booklet, or similar and will be distributed to engineers, leading hands, foreman and others with a responsibility for managing specific work locations or activities.

This documentation will be used to inform the broader workforce through either daily pre-start meeting (see section below) or provision in worker crib sheds/break facilities.

Refresher environmental awareness training will be undertaken as required, but not less than six (6) monthly intervals, based on environmental risks, following an incident, deviations from site rules and turnover of personnel. Refresher environmental awareness training will be recorded on the Environmental Training Register.

A training register is kept on site throughout the life of the Project, as part of Project Quality System to demonstrate compliance with EMS and sub plans activity training records.

Table 7-1 Example environmental training schedule

Training	Senior Managers	Superintendents	Engineers	Environmental Staff	Foreman	Leading Hands	Subcontractors	Administrative Staff
Project Inductions	✓	✓	✓	✓	✓	✓	✓	✓
Biodiversity Awareness (Induction and Toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Heritage Awareness (Induction and toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Noise, Dust, Erosion and Sediment Control (Induction and Toolbox talks)	✓	✓	✓	✓	✓	✓	✓	
Spill Response (Induction and toolbox talks)	✓	✓	✓	✓	✓	✓		
Erosion and sedimentation controls (including leachate drainage	✓	✓	✓	✓	✓	✓	✓	
Emergency procedures	✓	✓	✓	✓	✓	✓	✓	✓

7.3. Daily pre-start meetings

The pre-start meeting is a tool for informing the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day's work.

During the construction phase, the EPC Contractor's Construction Manager or EPC Contractor's Site Manager will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Daily pre-start meetings are generally succinct in nature and take about 10–15 minutes.

The environmental component of pre-starts will be determined by relevant EPC Contractor's Construction Manager or EPC Contractor's Site Manager and environmental personnel and will include any environmental issues that could potentially be impacted by, or impact on, the day's activities. All attendees will be required to sign on to the pre-start and acknowledge their understanding of the issues explained.

Pre-start topics, dates delivered, and a register of attendees will be recorded and kept on site as part of Project Quality System to demonstrate compliance with EMS activities.

8. Communication

8.1. Internal communication

Clear lines of communication through all levels and functions (e.g. management, staff and subcontractors), is key to minimise environmental impacts and achieving continual improvements in environmental performance.

The methods of communication on site throughout the life of the Project will include:

- Pre-start meetings
- Inductions
- Toolbox talks
- Alerts, bulletins and / or initiatives
- SWMS.

The EPC Contractor's Site HSE Advisor will meet as part of Project meetings to discuss any issues with environmental management onsite, any amendments to plans that may be required or any new/ changes to Project activities.

Daily environmental checks will be completed by the EPC Contractor's site team with relevant subcontractors HSE representatives, the Proponent shall be invited to attend these checks, where relevant. The purpose of these inspections will be to communicate ongoing environmental performance and to identify any issues to be addressed.

In addition, the EPC Contractor's Site HSE Advisor will participate in HSE toolbox talks on at least a weekly basis during the construction phase of the Project. This forum will provide an opportunity for the environment team members to communicate on environmental performance, to advise on any upcoming sensitive environmental matters for future work areas and receive feedback from onsite personnel.

Further internal communication regarding environmental issues and aspects will be through awareness training as described in Section 7.2 of the EMS.

8.2. External communication

8.2.1. Agencies and authorities

The Proponent's Project Manager has the responsibility to report on the ongoing environmental performance of the Project to DPHI and any other relevant authorities. The EPC Site HSE Advisor will report regularly to the Proponent on progress and any key environmental matters. The Proponent's Project Manager will report to DPHI through the monitoring and reporting requirements listed in Section 10.4 and Section 10.5 of the EMS.

The EPC Contractor's Project Manager, and the EPC Contractor's Site HSE Advisor are the two 24-hour contacts. They have the authority to halt the progress of the works if necessary, at any phase of the Project. They are the key emergency response personnel during an environmental site emergency.

The EPC Contractor's Site HSE Advisor is the authorised contact person for communications with the Proponent, DPHI, NSW Environment Protection Authority (NSW EPA) and any other relevant authorities on environmental matters. The Proponent will be included in all correspondence with any regulatory Authorities, unless agreed otherwise.

A report will be prepared each time the Development footprint is visited by NSW EPA and any other relevant authorities, and the Proponent will be immediately notified. The Report will be provided to the Proponent within 1 week of the visit.

Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Proponent must notify DPHI in writing via the Major Projects website portal 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 DPHI in writing prior to commencing the relevant stage, and clearly identify the development that will be carried out during the relevant stage.

It is noted that the Proponent must comply with any requirement/s of the Secretary arising from the Department's assessment of:

- Any strategies, plans or correspondence that are submitted in accordance with this consent
- Any reports, reviews or audits commissioned by the Department regarding compliance with this consent
- The implementation of any actions or measures contained in these documents.

8.2.2. Community and stakeholders

Ongoing consultation will be conducted throughout the construction and operation of the Project. Project updates during all stages of the Project will be undertaken via newsletters, Project website and media releases. The community will be able to provide feedback and ask questions to the Proponent via the Project website, email address and phone number which will be provided with the Project updates and published on the Project website. Refer to below for details on the Complaints Procedure. If required, monitoring relating to the aspect raised by the complainant will be undertaken.

8.3. Complaint procedure

External complaints are defined as complaints received from parties outside of the normal lines of communication.

Complaints and enquiries regarding the works will be received through the contact details provided on the Project website, as outlined in Table 8-1. All complaints received are reportable incidents and shall be immediately reported to the EPC Contractor during the construction phase, and the Proponent during the Operation phase.

Table 8-1 Complaint lodging contact details (for all phases of the Project)

Project website	https://www.enelgreenpower.com/our-projects/in-development/quorn-park-hybrid-project
Contact	Giulia Scataglini, Community Engagement and Sustainability Officer Enel Green Power Australia

Telephone number (toll-free)	0419 668 522
E-mail	quornparkhybrid@enel.com
Mail	Level 23,One International Towers 100 Barangaroo Ave Sydney NSW 2000

The contact details in the above table will be published on the Project's public website, alongside an outline of the complaints and investigation process.

Step 1 Receive and register a complaint

Contact is received from community members and may be received through the following methods: verbally either in person or via telephone or in written form via electronic mail and/or via the website.

It may be an inquiry, a concern or a complaint. If it is an inquiry or a concern, we will respond directly to this and simply record this interaction in the stakeholder register.

If it is a complaint, then the following procedure is followed:

Upon the receipt of a complaint, a set of standardised information will be collected, recorded and filed to ensure an efficient and standardised process.

The following information will be requested from community members:

- The complainant's name and address
- The complainant's concerns including date, time, prevailing conditions and description of the complaint.

This information must then be recorded in the relevant Project's Complaints Register.

Step 2 Acknowledging complaints

A non-urgent complaint will be acknowledged by the responsible Project Manager or relevant Project representative within 5 business days of the complaint being submitted. If it's an urgent complaint, then a response will be provided within 48 hours. This acknowledgement will be made via phone or email with any written correspondence dated and kept on file.

The acknowledgement will include:

- A summary of the complaint, with a reference number provided
- The opportunity to clarify issues or a request for further information if required
- The proposed investigation approach
- An estimated timeframe in which the stakeholder can expect to receive a response.

Where a complaint can be easily resolved or is better categorised as a request by a stakeholder for additional information, it may be appropriate for the Project Manager or relevant Project representative to immediately respond to the stakeholder.

Step 3: Investigating complaints

The Project Manager is responsible for ensuring all complaints are investigated and that all reasonable attempts to seek a resolution are made. The investigation may be delegated to an appropriate staff member. Accurate records of the investigation must be maintained including records of meetings, discussions and activities.

The investigation may involve:

- Site visits, particularly in the instance of reported property damage
- Consultation with staff or contractors, including senior management when required
- Acquiring monitoring data and evidence (e.g. for noise or dust complaints)
- Contacting external stakeholders.

Step 4: Responding to stakeholder/complainant

Following the investigation, the results, including details of the findings and proposed resolution, will be clearly explained to the complainant. In most circumstances, it will be at this stage that the complainant will determine if the resolution is satisfactory.

Step 5: Closing the complaint

If the process has been concluded appropriately then the Project Manager will close the complaint and make a file-note to this effect in the Complaints Register. Formal written correspondence must also be issued to the complainant confirming that the complaint has been closed.

If the complainant is not satisfied with the investigation and resolution, then the complainant has a right of review. This will be undertaken by the Project Manager to ensure that the complaint process has been properly followed.

If a complainant is not satisfied with the investigation and proposed resolution, the complainant will be advised that they have the right to contact a number of other bodies such as Parkes Shire Council or the Australian Energy Infrastructure Commissioner or seek legal advice. The Proponent will provide complainants with the relevant contact details, as seen in Table 8-2 below.

Table 8-2 Alternative complaint contacts

Alternative Contact	Email / number
Parkes Shire Council	council@parkes.nsw.gov.au
Australian Energy Infrastructure Commissioner	aeic@aeic.gov.au
LegalAid NSW (Orange)	02 6362 3983

Step 6: Recording and registering the complaint

Upon the closing of a complaint, the following information will be updated in the Complaints Register with the additional following details:

- The process of investigation that was undertaken to resolve the complaint
- What the proposed resolution was
- Whether this was accepted and how it was implemented
- Whether or not the complaint has been resolved to the satisfaction of the complainant
- The reason why the complaint was closed.

8.4. Dispute resolution

Any disputes that may arise during any phase of the Project, will be handled by the Proponent's Project Manager in accordance with the complaint procedure outlined in Section 8.3 above.

9. Incidents and emergencies

9.1. Emergency contact details

Emergency contact details for key Project personnel and emergency services are listed in Table 9-1.

Table 9-1 Emergency contact details for the Project

Name / organisation	Contact
EPC Project Manager	Felipe Herrera
EPC Construction Manager	Shaun Griggs
EPC HSE Advisor	Owen Davies
Emergency (Police, Fire, Ambulance)	000
NSW SES	132 500
NSW Fire and Rescue Parkes	(02) 6822 9117
Parkes Hospital	(02) 6861 2400
RSPCA NSW	1300 278 358
WIRES NSW	1300 094 737
Parkes Shire Council	(02) 6861 2333

9.2. Emergency and incident preparedness

The following plans relating to emergency and incident response have been prepared for the Project:

- Fire Safety Study
- Emergency Plan
- Health and Safety Management Plan.

During the course of the Project, the following preventative strategies will be implemented onsite:

- Daily inspections of active work sites
- Completion of Environmental Inspection Checklist (weekly)
- Issue and quick close-out of non-compliance notices

- Prompt maintenance and repairs
- Adhere to RFS hot works and other fire activity restrictions
- Environmental training
- Access for emergency services vehicles will be maintained throughout the Development footprint at all times
- Environmental audits of worksites, subcontractors and general compliance.

Spill kits will be available, stocked and maintained at the main site office. Liquid substances will be stored in designated storage locations and in accordance with relevant Australian Standards and kept to a minimum. Spill kits and other emergency supplies (e.g. silt fences, pumps) will also be located at site compounds, machinery park up areas and on refuelling vehicles.

Personnel involved in emergency response activities will be provided with specific training. As a minimum for environmental response, all light vehicles and light trucks/heavy vehicles shall carry a vehicle spill kit to provide immediate response to an event. Hydrocarbon spills are noted as the most likely type of occurrence on the works.

Consulting with emergency services and NSW Police as required throughout construction to ensure that any potential impacts to emergency services are identified and appropriately managed.

An up-to-date list of emergency response personnel and relevant organisations (emergency services, EPA, etc.) will be maintained at the main office and site compounds.

All staff will be trained on what to do and how to respond to an emergency onsite during the site induction and throughout the life of the Project via ongoing safety training and toolboxes.

A designated 4X4 vehicle of the EPC Contractor will be allocated for site emergencies at all times during the entire construction phase of the Project.

9.3. Emergency Plan and Fire Safety Study

In accordance with Condition 27 of Schedule 3, a comprehensive EP with detailed emergency procedures has been prepared for the development, to the satisfaction of Fire and Rescue NSW and the NSW Rural Fire Service. The EP (and ESIP) will be prepared prior to the commencement of construction of the solar farm. The Applicant will keep two copies of the plan on-site in a prominent position adjacent to the site entry points at all times. The EP:

- Is consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS Planning for Bushfire Protection 2019 (or equivalent)
- Identifies the fire risks and hazards and detailed measures for the development to prevent fires igniting
- Lists work that must not be carried out during a total fire ban
- Includes availability of fire suppression equipment, access and water
- Includes procedures for the storage and maintenance of any flammable materials
- Details access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency
- Includes a figure showing site infrastructure, Asset Protection Zone and the fire fighting water supply
- Includes location of hazards (physical, chemical and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations

- Includes details of the location, management and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone
- Includes bushfire emergency management planning
- Includes details of how the RFS would be notified, and procedures that would be implemented, in the event that:
  - there is a fire on-site or in the vicinity of the Development footprint ;
  - there are any activities on site that would have the potential to ignite surrounding vegetation; or
  - there are any proposed activities to be carried out during a bushfire danger period. Following approval, the Applicant must implement the EP.

In accordance with Condition 26 of Schedule 3, the EP also outlines how the Proponent will minimise and manage the fire risks of the Development, including managing vegetation fuel loads on-site as well as ensure the development:

- Includes at least a 10 metre defendable space around the perimeter of the solar array area that permits unobstructed vehicle access
- Manages the defendable space and solar array areas as an Asset Protection Zone (APZ)
- Complies with the relevant asset protection requirements in the RFS's *Planning for Bushfire Protection 2019* (or equivalent) and *Standards for Asset Protection Zones*
- Is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road, with the water level of the tank(s).

Following approval, the Applicant will implement the EP.

The Proponent and the EPC Contractor will assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the Development footprint. The Proponent will also notify the relevant local emergency management committee following construction of the development, and prior to commencing operations. In accordance with Condition 27 of Schedule 3 of the Consolidated Development Consent, the EP will be implemented for the duration of the development, and two copies of the EP will be kept on site in a prominent position adjacent to site entry and exit points following commencement of battery storage.

A FSS will be prepared prior to the commencement of construction of the BESS. The FSS will be prepared to the satisfaction of the Secretary (and meet the requirements of FRNSW) and implemented for the Project.

The FSS will:

- Be consistent with:
  - The Department’s Hazardous Industry Planning Advisory Paper No. 2 ‘Fire Safety Study guideline
  - NSW Government’s Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and
- Describe the final design of the battery storage facility.

Following approval, the Proponent will implement the FSS.

9.4. Environmental incidents

An Environmental Incident is defined as an unplanned event impacting, or potentially impacting the environment with consequences.

Various environmental incidents may have the potential to occur on site across all phases of the Project, which may include but not be limited to the following:

- Spills of fuels, oils, chemicals and other hazardous materials
- Unauthorised discharge from sediment basins or other containment devices
- Unauthorised clearing or clearing beyond the extent of the Project boundary or premises
- Inadequate installation and subsequent failure of temporary erosion and sediment controls
- Unauthorised damage or interference to threatened species, threatened ecological communities or critical habitat
- Unauthorised harm or desecration to Aboriginal Heritage objects and Aboriginal Heritage places
- Unauthorised damage or destruction to any State or locally significant relic or Heritage item
- Potential contamination of waterways or land
- Accidental starting of a fire or a fire breaking out of containment
- Any potential breach of legislation, including a potential breach of a condition of: An environment protection licence, approval, or any agency permit condition
- Works done that are not covered by the Project approval, or not found to be consistent with the approval, or done without a modification of the approval
- Works undertaken that are not in accordance with the Environmental Assessment documents
- Unauthorised dumping of waste.

Should an incident occur, the EPC Construction Manager and Site HSE Advisor will ensure that work ceases in that area and that the site is not disturbed until the appropriate level of investigation is conducted to ensure that any potential evidence is preserved. Incident reporting is detailed in Section 10.5 of this EMS.

9.5. Non-compliance, corrective and preventative actions

Any member of the Project team may raise a non-compliance or improvement opportunity at any phase of the Project. Environmental non-compliances might include:

- Failing to comply with the environmental regulations or license/ approval conditions
- A serious breach of EMS requirements
- Carrying out an unsafe work practice that has the potential to cause harm to the environment
- Activities that have caused actual impacts to the environment not permitted by the Project or covered in the environmental assessment documentation
- Deficiencies or concerns raised by client representatives and/or by state and local authorities or agencies.

Non-compliances will be reported in accordance with the incident management procedures provided in Section 10.5 of the EMS. For each non-compliance identified a corrective/preventative action (or actions) must be implemented. Environmental management improvement opportunities may also be initiated as a result of incidents or emergencies, monitoring and measurement, audit findings or other reviews. Improvement opportunities may also result in the implementation of corrective/preventative actions.

Corrective/preventative actions and improvement opportunities will be entered into the contractor's incident management system database and include detail of the issue, action required and timing and responsibilities. The record will be updated with date of close out and any necessary notes. The database will be reviewed regularly to ensure actions are closed out as required.

Non-compliance activities may be stopped, if necessary, by the EPC Site HSE Advisor following consultation with the Construction Manager or delegate. The works will not recommence until a corrective/preventative action has been closed out. The Proponent may also stop works in these circumstances. In such circumstances a non-compliance report must be prepared in accordance with the Incident Management Procedure.

10. Inspections, monitoring and auditing

10.1. Environmental inspections

Throughout the construction phase of the Project, the EPC Site HSE Advisor will be responsible for carrying out weekly environmental inspections and attending joint environmental site inspections, refer to Table 10-1. Further details and specifics regarding inspections throughout all phases of the Project will be detailed in the specific staged environmental management plan i.e. CEMP, OEMP, REMP or DEMP.

The subcontractors will attend inspections in relevant areas as required. The EPC Site HSE Advisor will attend debriefing session following inspections.

At completion of the inspection, the EPC Site HSE Advisor will prepare the following:

- A site inspection report
- A site inspection action plan listing deficiencies and corrective actions required
- Subcontractor notices for major/ serious deficiencies.

All deficiencies must be promptly issued to the applicable parties, actioned, verified and closed out within an appropriate time frame based on the risk score associated with each deficiency. Actions listed will be identified and an appropriate time frame to close out will take into consideration risks (e.g. location, weather).

Other environmental specialists may be engaged to enter site for the purposes of surveillance or inspection, to liaison with Project personnel, and to attend site meetings to discuss aspects of the work.

Table 10-1 Inspection schedule

Activity	Frequency	Responsibility
Environmental site inspection	Weekly during construction Monthly during operations	EPC Site HSE Advisor
Joint Environmental site inspection	Fortnightly during construction Quarterly during operations	Proponent's Representative EPC Site HSE Advisor

10.2. Environmental monitoring

The objective of the monitoring and reporting will be to validate the impacts predicted for the Project, to measure the effectiveness of environmental controls and implementation of this EMS, and to address specific requirements for each phase of the Project. A detailed summary of the Project monitoring requirements is provided in Table 10-2 to Table 10-5 below. Refer to the relevant sub-plans for more information.

Table 10-2 Summary of general monitoring requirements

Aspect	Addressed	Monitoring parameters	Frequency	Responsibility	Reporting
Aboriginal Cultural Heritage	AHMP	• Site inspections will be conducted to: ○ Monitor the performance of mitigation measures in the AHMP ○ Ensure heritage management measures are fully implemented (e.g. erection of fencing and signage around heritage items not approved to be impacted[1]) ○ Ensure no environmental incidents relating to heritage occur.	Weekly. Additional monitoring (and assessment, if required) will be undertaken in response to: • The identification of new Aboriginal sites or artefacts (unexpected finds) • An environmental incident relating to heritage.	Proponent EPC PM	Recording sheets An annual monitoring report will be prepared, summarising the findings of the inspections.
Traffic	TMP	• Monitoring light and heavy vehicle movements via vehicle logs	Daily	Proponent EPC PM	Recording sheets / site diary
		• Visual monitoring of trucks leaving site, to ensure loads are appropriately secured	Daily	Proponent EPC PM	
		• Monitoring of the approved access route (between the western edge of	Twice daily (during construction), between the AM and PM hours	Proponent EPC PM	

[1] Refer to Figure 4-2 of the AHMP for salvaged sites and Figure 5-1 of the AHMP for extant (valid) sites.

Aspect	Addressed	Monitoring parameters	Frequency	Responsibility	Reporting
		Parkes and the development site)			
		• Monitoring of the Henry Parkes Way and McGrath Lane intersection through physical inspections or via a camera	Twice daily (during construction), between the AM and PM hours	Proponent EPC PM	
		• Monitoring Henry Parkes Way intersection, the full length of McGrath Lane and the portion of Back Trundle Road between the road access and McGrath Lane.	Weekly, or twice daily following rainfall events that result in more than 5mm of rain in a 24 hour period	Proponent EPC PM	
		• Monitoring of daily traffic conditions (using Live Traffic - https://www.livetraffic.com/) to identify accidents (or other temporary conditions) and implement appropriate diversions, as required.	Daily (during construction)	Proponent EPC PM	
		• Monitoring of weather and onsite conditions through the Bureau of Meteorology (BoM).	Daily (during construction)	Proponent EPC PM	

Aspect	Addressed	Monitoring parameters	Frequency	Responsibility	Reporting
		• Dilapidation surveys	• Prior to road upgrades • Following local road upgrades, but prior to the commencement of preliminary site works • Following the Henry Parkes Way/McGrath Lane intersection upgrades but prior to the commencement of construction of the solar farm • Within 2 months of construction commencing • Within 1 month prior to the completion of construction; and • Within 1 month after the completion of construction.	Proponent EPC PM	Dilapidation reports
Emergency	EP	• Monitoring will be undertaken during periods of high / prolonged rainfall (utilising BoM, State Emergency Service (SES) warnings and mobile alerts from the Early Warning Network) to inform flood risk.	As required.	Proponent EPC PM	Site Diary

Table 10-3 Monitoring requirements and performance criteria from the GMP

Action	Where monitoring will be undertaken	Description	Short term performance criteria 6 – 12 months post construction	Medium term performance criteria 1 - 5 years post construction	Long term performance criteria > 5 years post construction	Corrective actions (Adaptive management response options)	Completion criteria (Long-term outcome)
Groundcover Surveys To be completed weekly for the first three months, and then quarterly thereafter.	• At high traffic areas where sheep may congregate (water points, camps and gateways) • Monitoring locations will be selected in accordance with Section 6.5 of the GMP • A map would be produced within 6 months of the completion of construction providing the location of each monitoring sites.	• Refer to Section 6.5 of the GMP. • Monitoring proformas are provided in the GMP.	**Responsibility – EPC HSE Advisor:** **Performance criteria** • Groundcover maintained at or greater than 70% percent foliage cover (PFC) • Soil amelioration applied • Pasture mix suitable for the area planted and monitored	**Responsibility – TBC** **Performance criteria** • Groundcover maintained at or greater than 70% PFC • Diverse range of pasture species maintained (minimum of three (3)) • Evidence of regeneration of annual pasture species	**Responsibility – TBC** **Performance criteria** • Groundcover maintained at or greater than 70% PFC • Diverse range of pasture species maintained (minimum of three (3)) • Evidence of regeneration of annual pasture species	During construction: • Complete toolbox talks on the importance of maintaining groundcover within the development site During construction / operation: • Train staff on identifying selected pasture species • If no improvement in PFC has been observed or groundcover is <70% for longer than three months, an agronomist will be consulted and additional measures implemented • If groundcover falls <70% during drought conditions, grazing animals will be removed from the Development footprint. Organic matter (e.g. dead grass) will be left in-situ to protect soil from erosion. Once the period of drought has ended, the Groundcover Establishment Procedure (Table 6-1 of the GMP) will be implemented.	• Groundcover maintained at or greater than 70% PFC • Diverse range of pasture species maintained (minimum of four (4)) • Evidence of regeneration of annual pasture species • The soil condition will be at or better than the current applicable land and soil capability of Class 4 for the entire life of the project and post- decommissioning. Refer to the GMP for further information.
			Trigger for Adaptive Management Performance criteria (above) not met				
			Adaptive Management See “corrective actions”.				
			Responsibility – Grazing manager: Early grazing is permissible, but only low grazing pressure permitted to allow pasture species to set seed.	**Responsibility – Grazing manager:** Grazing intensity and stocking rate would be responsive to seasonal conditions	**Responsibility – Grazing manager:** Grazing intensity and stocking rate would be responsive to seasonal conditions		

Table 10-4 Monitoring programs and performance criteria from the BMP

Action	Where monitoring will be undertaken	Description	Short term performance criteria Within three (3) months of commencing construction	Medium term performance criteria Up to 5 years post construction	Long term performance criteria > 5 years post construction	Corrective actions (Adaptive management response options)	Completion criteria (Long-term outcome)
Annual Survey	Project ecologist will select 2 -3 permanent monitoring locations within each of the retained vegetation areas, refer to Figure 2-3	Annual monitoring to include the following: • 50 m x 20 m plots, including transect and photo monitoring points • The GIS location of each monitoring point will be logged • Data will be collected regarding species composition, age demographic, habitat complexity and opportunity and weed presence / absence • Monitoring will occur at approximately the same time each year • An annual report will be prepared and submitted to BCD. The annual report will include: ○ An assessment of vegetation condition to date, to determine whether assisted regeneration efforts have resulted in an increase in the Vegetation Integrity (VI) score. ○ Photographs (from each photo monitoring point) taken during the previous monitoring period (if relevant), to provide meaningful visual comparisons regarding the success of regeneration efforts ○ Weed presence / absence and abundance ○ An assessment on whether the performance criteria have been achieved, and if not, recommendations for further works required.	**Responsibility – EPC HSE Advisor:** **Performance criteria** The first monitoring event will be completed within three (3) months of commencing construction[2] and will: • Verify existing Vegetation Integrity (VI) score (currently 47.1) • Determine weed cover (%) • Determine the number of native upper, mid and lower stratum species / abundance • Confirm no indicators of grazing animals within areas of retained vegetation	**Responsibility – TBC** **Performance criteria** Will be confirmed following the first monitoring event, but likely to include: • A 10% increase in the baseline VI score • A 5% increase in the abundance of upper, mid and lower stratum species • A 10% decrease in weed species • A 25% decrease in high threat weeds • No indicators of grazing animals within areas of retained vegetation	**Responsibility – TBC** **Performance criteria** Will be confirmed following the first monitoring event, but likely to include: • A 15% increase in the baseline VI score • A 10% increase in the abundance of upper, mid and lower stratum species • A 20% decrease in weed species • A 50% decrease in high threat weeds • No indicators of grazing animals within areas of retained vegetation	Short term adaptive management actions: • Project ecologist engaged to undertake monitoring as soon as practicable • Weed management implemented (after determining weed cover (%)) • Grazing animals removed from areas of retained vegetation • Fences repaired / reinforced (if required) Medium to long term adaptive management actions: • Project ecologist engaged to provide advice to improve vegetation condition • Sowing of native grasses and forbs • Weed management implemented • Grazing animals removed from site • Fences repaired /	Will be confirmed following the first monitoring event (and following the baseline weed species), but likely to include: • A 15% increase in the baseline VI score OR • A 10% increase in the abundance of upper, mid and lower stratum species • A 20% decrease in weed species • A 50% decrease in high threat weeds • No indicators of grazing animals within areas of retained vegetation
			Trigger for Adaptive Management Performance criteria (above) not met				

[2] Performance criteria may need to be updated, following the first monitoring event, noting that the last vegetation survey was completed in 2018 (EMM, 2018) and may not be representative of current site conditions. Once updated, the BMP will be updated and provided to BCD for comment. Once approved, the EMS will be updated to reflect any changes to the performance criteria.

Action	Where monitoring will be undertaken	Description	Short term performance criteria Within three (3) months of commencing construction	Medium term performance criteria Up to 5 years post construction	Long term performance criteria > 5 years post construction	Corrective actions (Adaptive management response options)	Completion criteria (Long-term outcome)
			Adaptive Management See "corrective actions"			reinforced (if required)	

Action	Where monitoring will be undertaken	Description	Short term performance criteria Within three (3) months of commencing construction	Medium term performance criteria Up to 5 years post construction	Long term performance criteria > 5 years post construction	Corrective actions (Adaptive management response options)	Completion criteria (Long-term outcome)
Weed monitoring **Annually**	Surveys will be undertaken throughout the development site boundary.	A Baseline Weed Survey will be conducted and provided to BCS for comment. The baseline survey will include: • Weed survey methodology • Weed mapping, including Weeds of National Significance and Priority Weeds that occur in the development site boundary (including abundance) • Weed management requirements. Follow-up surveys will be undertaken annually with mapping produced identifying treatment locations, weed locations and spatial distribution to allow comparison between monitoring periods. The BMP will be updated following completion of the baseline weed survey.	**Responsibility – EPC HSE Advisor:** **Performance criteria** A baseline weed survey[3] will be completed within three (3) months of commencing construction. Following completion of the baseline survey, (additional) short-, medium- and long-term performance criteria will be implemented.	**Responsibility – TBC** **Performance criteria** To be confirmed (in consultation with BCS) following baseline survey. **Likely criteria:** Weed management actions. Reduction of weed infestation.	**Responsibility – TBC** **Performance criteria** To be confirmed (in consultation with BCS). The BMP will be updated following completion of the baseline weed survey. **Likely criteria:** Reduction of weed infestations compared to baseline, or maintenance of low weed presence.	Will be confirmed following the baseline weed survey, but is expected to include: • Investigate the source of the weed species spread and improvements to be made to weed management measure onsite. • Herbicide application (spot spraying) • Manual removal • If required, explore alternative treatment and management options in consultation with the Project Ecologist. • Mulching or planting to suppress weeds. • Update hygiene protocol. • Provide refresher training for staff on weed hygiene.	To be confirmed (in consultation with BCS). The BMP will be updated following completion of the baseline weed survey.
			Trigger for Adaptive Management Performance criteria (above) not met				

[3] The baseline weed survey (including short, medium and long-term performance criteria, corrective actions and completion criteria) will be provided to BCS within three (3) months of commencing construction, for comment and approval.

Action	Where monitoring will be undertaken	Description	Short term performance criteria Within three (3) months of commencing construction	Medium term performance criteria Up to 5 years post construction	Long term performance criteria > 5 years post construction	Corrective actions (Adaptive management response options)	Completion criteria (Long-term outcome)
			Adaptive Management See "corrective actions".				
Pest monitoring	Surveys will be undertaken throughout the development site boundary	A Baseline Pest Survey will be conducted and provided to BCS for comment. The baseline survey will include: • Pest survey methodology • Pest identification, locations (mapped) and abundance • Pest management requirements. Follow-up surveys will be undertaken at the same time each year, with mapping produced identifying pest locations, to allow comparison between monitoring periods. The BMP will be updated following completion of the baseline pest survey.	**Responsibility – EPC HSE Advisor:** **Performance criteria** A baseline pest survey[4] will be completed within three (3) months of commencing construction. Following completion of the baseline survey, (additional) short-, medium- and long-term performance criteria will be implemented.	**Responsibility – TBC** **Performance criteria** To be confirmed (in consultation with BCS). The BMP will be updated following completion of the baseline pest survey.	**Responsibility – TBC** **Performance criteria** To be confirmed (in consultation with BCS). The BMP will be updated following completion of the baseline pest survey.	Will be confirmed following the baseline pest survey, but are expected to include: • Investigate the source of the pest species (e.g. location of rabbit burrows) and implement approach management measures, in consultation with an appropriately qualified person • Installation of baits • Ground shooting (if required), to be conducted by an appropriately qualified person • If required, explore alternative treatment and management options in consultation with the Project Ecologist.	To be confirmed (in consultation with BCS). The BMP will be updated following completion of the baseline pest survey.
			Trigger for Adaptive Management Performance criteria (above) not met				
			Adaptive Management See "corrective actions".				

[4] The baseline pest survey (including short, medium and long-term performance criteria, corrective actions and completion criteria) will be provided to BCS within three (3) months of commencing construction, for comment and approval.

Table 10-5 Monitoring program and performance criteria from the LP (Premise, October 2024)

Task	Establishment phase (0-1 years after planting)			1 – 3 years after planting			>3 years after planting		
	Timing	Description	Responsibility	Timing	Description	Responsibility	Timing	Description	Responsibility
Watering	Weekly for initial three (3) months then monthly	Regular watering (via a ute mounted irrigation system) when <30 mm of rain has occurred in that month	O&M Site Service Manager	Every 2-3 months	Regular watering (via a ute mounted irrigation system) when <10 mm of rain has occurred in that month	O&M Site Service Manager	Every 2-3 months	Regular watering (via a ute mounted irrigation system) when <10 mm of rain has occurred in that month	O&M Site Service Manager
	Weekly	For sections with irrigation, check all irrigation equipment is fully functional and water	O&M Site Service Manager	Monthly	For sections with irrigation, check all irrigation equipment is fully functional and water	O&M Site Service Manager	Remove irrigation once established. Hand water in very dry years.		
Slashing	Once prior to planting	Slash groundcover	O&M Site Service Manager	Every 6 months	As required, if exotic groundcover species become dominant	O&M Site Service Manager	Annually	As required, if exotic groundcover species become dominant	O&M Site Service Manager
Weeding (within landscape plantings)	Monthly	Sport spray or manually remove weeds	O&M Site Service Manager	Monthly	Sport spray or manually remove weeds	O&M Site Service Manager	Every six months	Sport spray or manually remove weeds	O&M Site Service Manager
Plant replacement	Monthly	Planting in areas to replace plants which have died.	O&M Site Service Manager	Quarterly	Planting in areas to replace plants which have died.	O&M Site Service Manager	N/A		

10.3. Auditing

10.3.1. Internal audits

The EPC contractor will conduct internal audits within three (3) months of start of construction work onsite and then at least every six (6) months after that (refer to Table 10-6) during construction. These audits will be risk-based and verify that the work under the contract complies with the EMS, sub-plans and approval requirements. More frequent auditing may occur if environmental checks indicate major deficiencies with the environmental management of the Project .

Internal audits will be conducted in accordance with ISO 19011:2014 - *Guidelines for Quality and/or Environmental Management Systems Auditing*, however where a specific issue arises internally, this will not necessarily follow this standard.

Internal audit reports will be submitted to the Proponent within ten (10) working days of the audit. A final audit report will be submitted to the principal within five working days of the contract completion date. The Contractor must also allow the Proponent to conduct audits of the Contractors HSE management system, relevant management plans and compliance with system and plans at any phase of the Project.

An audit checklist will be developed and amended as necessary to reflect changes to this EMS, subsequent approvals and changes to Acts, regulations or guidelines.

10.3.2. Independent environmental audits

Independent auditing will be conducted and carried out by an independent environment auditor in accordance with ISO 19011:2014 - *Guidelines for Quality and/or Environmental Management Systems Auditing*.

In accordance with Condition 9 of Schedule 4 of the Consolidated Development Consent, Independent Audits of the Project must be conducted and carried out by a suitably qualified, experienced and independent team of experts in consultation with relevant agencies and in accordance with the *Independent Audit Post Approval Requirements (2020),* to the following frequency:

- Within 3 months of commencing construction
- Within 3 months of commencement of operations, or
- As directed by the Secretary.

The audit will:

- Be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary
- Assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and
- Recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent, as required.

Within three 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).

Table 10-6 presents auditing requirements that are applicable to the Project.

Table 10-6 Audit summary table

No.	Audit	Requirement	Timing	Responsibility	Recipient
1	Internal audit	Verify compliance with legal requirements, specifications and construction documentation.	The first audit within 3 months of commencement of construction and then at six monthly intervals thereafter. The final submitted within five working days of construction contract completion date.	EPC Site HSE Advisor	Proponent
2	External independent audit	Verify compliance with approval and legal requirements, construction documentation and any other commitments.	Within 3 months of commencing construction; and Within 3 months of commencement of operations, As directed by the Secretary.	Proponent	DPHI
3	Proponent audits	Proponent to conduct audits of the Contractors HSE management system, relevant management plans and compliance with system and plans.	Monthly	Proponent	Proponent

10.4. Reporting

Table 10-7 sets out the reporting requirements applicable to the Project, timing of the reporting, who is responsible for managing preparation of the reports, and the intended recipient(s).

Additional reporting may be necessary as the works progress. In such a circumstance, Table 10-7 will be amended to reflect these changes.

Table 10-7 Reporting requirements

No.	Report	Requirement	Timing	Responsibility	Recipient
1	Monthly environmental report. Formalised in meeting minutes with client.	For incorporation in Project Monthly Reports including environmental statistics (i.e. incidents, regulatory action, complaints on environmental issues), regulatory and authority considerations, monitoring program performance, key environmental issues, environmental controls implemented, details of any non-compliances and actions undertaken to address the non-compliance, and any predicted environmental impacts for the following month.	Monthly	EPC Project Manger EPC Site HSE Advisor	Proponent
2	Proponent's environmental inspection report	Response to matter raised in the Proponent's site inspections.	Monthly	EPC Project Manager EPC Site HSE Adviser	Proponent
3	Independent Environmental Audit Report	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Secretary within 2 months of undertaking the independent audit site inspection as outlined in the *Independent Audit Post Approval Requirements (2020),* the Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	Within 2 months of commencing an Independent Environmental Audit	EPC Site HSE Advisor	Proponent

10.5. Incident and non-compliance reporting

During all phases of the Project, all workers (employees and contractors) are responsible for ensuring timely and effective initial internal reporting of incidents and non-compliances that they are involved with or witness.

The Proponent are to be informed of any environmental incidents or non-compliances immediately (verbally) and within 24 hours in writing. Incident reports will include lessons learnt from each environmental incident

and proposed measures to prevent the occurrence of a similar incident. All efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place. Incidents will be closed out as quickly as possible, taking all required action to resolve each environmental incident / non-compliance.

The EPC Contractor must liaise with the Proponent prior to notifying any agencies of any incident / non-compliance on site (i.e. EPA). Within 7 days of the date of the incident, the EPC Contractor must provide the Proponent and/or any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

Where an incident / non-compliance involves an Aboriginal site, relevant authorities such Heritage NSW and Registered Aboriginal Parties will be notified, and their input sought in closing out the incident /non-compliance.

10.5.1. Incident reporting in accordance with the conditions

In accordance with Condition 7 of Schedule 4 of the Consolidated Development Consent, the Department must be notified in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons and location for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.

10.5.2. Incident reporting in accordance with the POEO Act

The Proponent will notify the NSW EPA of any environmental incidents or pollution incidents on or around the development site via the NSW EPA Environment Line (telephone 131 555) in accordance with Part 5.7 of the *Protection of the Environment Operations Act 1997* (NSW) (POEO Act). The circumstances where this will take place include:

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

Pollution incidents posing material harm to the environment shall be notified by the Proponent to each ‘relevant authority’ as defined in Section 148 (8) of the POEO Act. ‘Relevant authority’ means:

- NSW EPA as the appropriate regulatory authority (ARA) on 131 555 or (02) 9995 5555.
- Safe Work NSW (formerly WorkCover) on 13 10 50.
- Fire and Rescue NSW on 000 or for Mobiles Only 112.

The incident must still be reported even when the incident is contained within the Development footprint

10.5.3. Non-compliance reporting in accordance with the conditions

In accordance with Condition 8 of Schedule 4 of the Consolidated Development Consent, DPHI must also be notified via the Major Projects website portal within 7 days after the Proponent 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 approval that the development is non-compliant with, the

way in which it does not comply and the reasons for the non- compliance (if known) and what actions have been done, or will be, undertaken to address the non- compliance.

11. Review and improvement

11.1. Revision

A document review process ensures that environmental documentation including this EMS is updated as appropriate for the specific works that are occurring on-site throughout the life of the Project. Reviews of the EMS are expected to be triggered by:

- Independent Environmental Audit
- Internal audits
- Additional environmental aspects and risks
- Environmental near misses and incidents
- Project stage change between construction, operation, and decommissioning.

Should the document review process identify any issues or items within the documents that are either redundant or in need of updating, it is the responsibility of the Proponent's Project Manager or delegate to prepare the revised documents.

In accordance with Condition 2 of Schedule 4 of the Consolidated Development Consent, review and revision of strategies,
plans or programs required under this consent must be to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; Review and revision of the strategies, plans or programs required under this consent are to be to the satisfaction of the Planning Secretary within 1 month of the:

- Submission of an incident report under Condition 7 of Schedule 4;
- Submission of an audit report under Condition 9 of Schedule 4; or
- Any modification to the conditions of this consent.

In accordance with Condition 3 Schedule 4 of the Consolidated Development Consent, the development may be staged, with the approval of the Secretary. In addition to this, to ensure that 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.

Only the Proponent's Project Manager, or delegate, has the authority to change any of the environmental management documentation at any time throughout all phases of the Project.

Should the EMS or management plans not require review or revision under Condition 2, then they will be reviewed by the Proponent's Project Manager as follows:

- Construction relates plans: at least 6 monthly
- Operational plans: bi-annually.

The approved EMS will be held in the site office and be available upon request.

11.2. Continuous improvement

Continuous improvement of this Strategy will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement. Continuous improvement is to be undertaken throughout all phases of the Project.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance
- Determine the cause or causes of non-conformances and deficiencies
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies
- Document any changes in procedures resulting from process improvement
- Make comparisons with objectives and targets.

12. Documentation

12.1. Environmental records

The EPC Site HSE Advisor is responsible for maintaining all environmental management documents as current at the point of use throughout the construction and operational phases of the Project. Types of records include:

- All monitoring, inspection and compliance reports/records
- Correspondence with public authorities
- Induction and training records
- Reports on environmental incidents, other environmental incidents, non-compliance, complaints and follow-up action
- Environmental events and Investigation reports, and trends
- Environmental monitoring data.
- Waste quantity reports and regulated waste documentation where required and in accordance with the NSW EPA waste management requirements
- Weed Hygiene Checklists
- Community engagement information.

All environmental management documents are subject to ongoing review and continual improvement. This includes times of change to scheduled activities or to legislative or licensing requirements.

12.2. Document control

The Proponent will coordinate the preparation, review and distribution, as appropriate, of the environmental management plans as well as the Conditions of Consent, and environmental assessment documents throughout the Project. During all phases of the Project, the environmental documents will be stored at the main site compound.

The Proponent will implement a document control procedure to control the flow of documents within and between stakeholders and subcontractors.

The procedure will also ensure that documentation is:

- Developed, reviewed and approved prior to issue
- Issued for use
- Controlled and stored for the legally required timeframe
- Removed from use when superseded or obsolete
- Archived.

A register and distribution list will identify the current revision of particular documents or data.

12.3. Access to information

As per Schedule 4 Condition 10 of the Consolidated Development Consent, the Proponent must make the following information publicly available on its website as relevant to the stage of the development and update to date:

- 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 (other than the Fire Strategy Study and Emergency Plan
- 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
- Any other matter required by the Secretary.

13. References

DIPNR. (2004). *Guideline for the Preparation of Environmental Management Plans.* Department of Infrastructure, Planning and Natural Resources.

DPHI. (determined 16 July 2020). Development Consent.

DPHI. (determined 7 June 2024). Consolidated Development Consent.

Premise. (2019). Environmental Impact Statement – Quorn Park Solar Farm. Premise Australia Pty Ltd.

Premise. (January 2020). Submissions Report – Quorn Park Solar Farm. Premise Australia Pty Ltd.

Premise. (May 2020). Amendment Report – Quorn Park Solar Farm. Premise Australia Pty Ltd.

Premise. (April 2024). Modification Application – Quorn Park Solar Farm. Premise Australia Pty Ltd.

Appendix A Project Conditions of Consent

Condition No.	Condition	Addressed
Schedule 2 Administrative Conditions		
Obligation to Minimise Harm to the Environment		
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.	EMS and subplans
Terms Of Consent		
2.	The Applicant must carry out the development: (a) generally in accordance with the EIS; and (b) in accordance with the conditions of this consent *Note: The general layout of the development is shown in Appendix 1.*	Section 1.1 of this EMS
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.	Section 1.1 of this EMS
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.	Section 8.2.1 of this EMS
Upgrading Of Solar Panels And Ancillary Infrastructure		
5.	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.	Section 2.4 of this EMS
Structural Adequacy		
6.	The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia. *Notes:* *• Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development.* *• Part 8 of the EP&A Regulation sets out the requirements for the certification*	Section 2.4 of this EMS

Condition No.	Condition	Addressed
	of the development.	
Demolition		
7.	The Applicant must ensure that all demolition work on site is carried out in accordance with *Australian Standard AS 2601-2001: The Demolition of Structures*, or its latest version.	Noted – No demolition proposed
Protection Of Public Infrastructure		
8.	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.	Section 6 of this EMS
Operation Of Plant And Equipment		
9.	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; (b) and operated in a proper and efficient manner.	Section 6 of this EMS
Schedule 3 Environmental Conditions – General		
Battery Storage Restriction		
1.	The battery storage facility or systems associated with the development must not exceed a total delivery capacity of 20 MW. *Note: This condition does not prevent the Applicant from seeking to lodge a separate development application or modify this consent to increase the capacity of the battery storage system in the future.*	Section 2.4 of this EMS
Transport **Over-Dimensional And Heavy Vehicle Restrictions**		

Condition No.	Condition	Addressed
2.	The Applicant must ensure that the: (a) development does not generate more than: • 63 heavy vehicle movements a day during construction, upgrading and decommissioning; • 3 over-dimensional vehicle movements during construction, upgrading and decommissioning; • 4 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 19 metres, (c) development does not generate more than 30 vehicle movements an hour at the intersection of Henry Parkes Way and McGrath Lane unless the Secretary agrees otherwise.	TMP
3.	The Applicant must keep accurate records of the number of over-dimensional and heavy vehicles entering or leaving the site each day for the duration of the project.	TMP
Access Route		
4.	All vehicles associated with the development must travel to and from the site via Henry Parkes Way, McGrath Lane, Back Trundle Road and the approved site access points on Back Trundle Road, as identified in the figure in Appendix 1 and Appendix 3. *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.*	Section 2.6 of this EMS TMP
Road Upgrades And Site Access		
5.	Unless the Secretary agrees otherwise, prior to commencing construction, the Applicant must implement the road upgrades identified in Appendix 3. 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.	Section 2.6 of this EMS TMP
Operating Conditions		
6.	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; (e) development-related vehicles leaving the site are in a clean condition to	TMP

Condition No.	Condition	Addressed
	minimise dirt being tracked onto the sealed public road network.	
Traffic Management Plan		
7.	Prior to commencing the road upgrades identified in condition 5 of Schedule 3, the Applicant must prepare a Traffic Management Plan for the development in consultation with TfNSW and Council, and to the satisfaction of the Secretary in writing. This plan must include: (a) details of the transport route to be used for all development-related traffic; (b) details of the road upgrade works required by condition 5 of Schedule 3 to this consent; (c) a protocol for undertaking independent dilapidation surveys to assess the: • existing condition of McGraths Lane and Back Trundle Road prior to construction, upgrading or decommissioning activities; and • condition of McGraths Lane and Back Trundle Road following construction, upgrading or decommissioning activities; (d) a protocol for the repair of McGraths Lane and Back Trundle Road if dilapidation surveys identify these roads to be damaged during construction, upgrading or decommissioning works; (e) details of the temporary on-site construction car park; (f) details of the measures that would be implemented to minimise traffic impacts during construction, upgrading or decommissioning activities, including: • temporary traffic controls, including detours and signage; • notifying the local community about development-related traffic impacts; • procedures for receiving and addressing complaints from the community about development related traffic; • minimising potential cumulative traffic impacts with other projects in the area, including the Goonumbla Solar Farm and the Parkes Solar Farm during construction, upgrading or decommissioning works; • minimising potential for conflict with school buses, other road users and rail services as far as practicable (measures also required during operation of the project), including preventing queuing on the public road network; • minimising dirt tracked onto the public road network from development-related traffic; • details of the employee shuttle bus service, including pick-up and drop-off points and associated parking arrangements for construction workers, and measures to encourage employee use of this service; • scheduling of haulage vehicle movements to minimise convoy length or	TMP

Condition No.	Condition	Addressed
	platoons; • responding to local climate conditions that may affect road safety such as fog, dust and wet weather; • responding to any emergency repair or maintenance requirements; and • a traffic management system for managing over-dimensional vehicles; (g) a driver's code of conduct that addresses: • travelling speeds; • driver fatigue; • procedures to ensure that drivers adhere to the designated transport routes; and • procedures to ensure that drivers implement safe driving practices; (h) a program to ensure drivers working on the development receive suitable training on the code of conduct and any other relevant obligations under the Traffic Management Plan; and (i) a flood response plan detailing procedures and options for safe access to and from the site in the event of flooding. Following the Secretary's approval, the Applicant must implement the Traffic Management Plan.	
Landscaping Vegetation Buffer		
8.	The Applicant must establish and maintain a vegetation buffer (landscape screening) as outlined in the figure in Appendix 1 to the satisfaction of the Secretary. The landscape screening must: (a) be planted prior to commencing operations; (b) be comprised of species that are endemic to the area; (c) minimise views from residence R2 and residence R4 within 3 years of commencing operations; (d) in addition to the locations outlined in the figure in Appendix 1, be located along the northern and western boundaries of the on-site substation to minimise views from residence R2 within 3 years of commencing operations; and (e) designed and maintained in accordance with RFS Planning for Bushfire Protection 2019 (or equivalent); (f) be properly maintained with appropriate weed management, unless the Secretary agrees otherwise.	LP
Landscaping Plan		
9.	Prior to commencing construction, the Applicant must prepare a detailed Landscaping Plan for the development in consultation with receivers R2 and R4, to the satisfaction of the Secretary. This plan must include: (a) a description of measures that would be implemented to ensure that the	LP

Condition No.	Condition	Addressed
	vegetated buffer achieves the objectives of condition 8 (a) – (f) above; (b) a program to monitor and report on the effectiveness of these measures; (c) details of who would be responsible for monitoring, reviewing and implementing the plan, and timeframes for completion of actions; and; (d) the final location of landscape planting around the on-site substation to minimise views from residence R2. Following the Secretary's approval, the Applicant must implement the Landscaping Plan.	
Land Management		
10.	The Applicant must maintain the agricultural land capability of the site, including: (a) establishing the ground cover of the site within 3 months following completion of any construction or upgrading; (b) properly maintaining the ground cover with appropriate perennial species and weed management; (c) and maintaining grazing within the development footprint, where practicable, unless the Secretary agrees otherwise in writing.	GMP
Biodiversity Vegetation Clearance		
11.	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	Section 2.2 of this EMS BMP
Biodiversity Offsets		
12.	Prior to commencing construction, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and Table 2 below, unless the Secretary agrees otherwise. The retirement of these credits must be carried out in accordance with the NSW Biodiversity Offsets 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) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the biodiversity offset scheme. ***Table 1:*** *Ecosystem Credit Requirements* ***Vegetation Community*** / ***PCT ID*** / ***Credits Required*** Western Grey Box – Poplar Box – White Cypress Pine tall woodland on red loams mainly of the eastern Cobar Peneplain Bioregion / 82 / 11 Riparian Blakeley's Red Gum – Box Scrub – Sedge grass tall open forest of the Central NSW South Western Slopes Bioregion / 278 / 1 Yellow Box Grassy Woodland on lower hillslopes and valley flats in the Southern NSW Brigalow Belt South Bioregion / 437 / 80 ***Table 2:*** *Species Credit Requirements* ***Species Credit Species*** / ***Credits Required*** Sloane's Froglet (Crinia sloanei) / 1 Brush-stone Curlew (Burhinus grallarius) / 3	Section 6 of this EMS BMP

Condition No.	Condition	Addressed
Biodiversity Management Plan		
13.	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 in writing. This plan must: (a) include a description of the measures that would be implemented for: • protecting vegetation and fauna habitat outside the approved disturbance areas; • 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; • 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, feral pests and pathogens; 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. *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.*	BMP
Amenity **Construction, Upgrading And Decommissioning Hours**		
14.	Unless the Secretary agrees otherwise, the Applicant may only undertake road upgrades, construction, upgrading or decommissioning activities between: (a) 7 am to 6 pm Monday to Friday; (b) 8 am to 1 pm Saturdays; (c) and 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	Section 2.8 of this EMS

Condition No.	Condition	Addressed
	the environment.	
Noise		
15.	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 *Interim Construction Noise Guideline (DECC, 2009)*, or its latest version.	Section 6 of this EMS CEMP
Dust		
16.	The Applicant must minimise dust generated by the development.	Section 6 of this EMS CEMP
Visual		
17.	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; (c) and not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	Section 2.4 of this EMS / Section 6 of the EMS
Lighting		
18.	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 Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting, or its latest version.	Section 6 of this EMS CEMP

Condition No.	Condition	Addressed
Heritage **Protection Of Heritage Items**		
19.	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 4 or any Aboriginal heritage items located outside the approved development footprint. Prior to carrying out any development that could directly or indirectly impact the Aboriginal heritage items identified in Table 2 of Appendix 4, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location on site, in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010), or its latest version. *Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figures in Appendix 4.*	AHMP
Heritage Management Plan		
20.	Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary in writing. This plan must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary in writing; (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 1 of Appendix 4 or items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction; • salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 4; • 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; and (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.	AHMP
Soil And Water **Water Supply**		

Condition No.	Condition	Addressed
21.	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. *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.*	Section 6 of this EMS CEMP
Water Pollution		
22.	The Applicant must ensure that the development does not cause any water pollution, as defined under Section 120 of the POEO Act.	Section 6 of this EMS CEMP
Operating Conditions		
23.	The Applicant must: (a) ensure the solar panels and ancillary infrastructure (including security fencing) are designed, constructed and maintained to reduce impacts on surface water, flooding and groundwater at the site; (b) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the Managing Urban Stormwater: Soils and Construction (Landcom, 2004) manual, or its latest version; (c) ensure the solar panels and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; (d) and ensure all works are undertaken in accordance with the *Guidelines for Controlled Activities on Waterfront Land* (NRAR, 2018), or its latest version unless the Water Group agrees otherwise.	CEMP
Hazards **Fire Safety Study**		
24.	Prior to commencing construction of the battery storage facility, unless the Secretary agrees otherwise, the Applicant must prepare a Fire Safety Study for the development, in consultation with FRNSW and RFS. The study must: (a) be consistent with the: • Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline; • 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 Fire Safety Study.	FSS Section 9.3 of this EMS
Storage And Handling Of Dangerous Goods		

Condition No.	Condition	Addressed
25.	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 *Storing and Handling of Liquids: Environmental Protection – Participants Handbook* 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.	CEMP
Operating Conditions		
26	The Applicant must: (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site; (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 Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones (including provision of water, electricity and gas, ancillary equipment, transmission lines and management of vegetation); • is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank(s), fitted with a 65mm Storz fitting and a FRNSW compatible suction connection 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.	Emergency Plan Section 9.3 of this EMS
Emergency Plan		
27.	Prior to commencing construction, 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 NSW Rural Fire Service. 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's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning' and RFS Planning for Bushfire Protection 2019 (or equivalent); (b) identify the fire risks and hazards and detailed measures for the	Emergency Plan Section 9.3 of this EMS

Condition No.	Condition	Addressed
	development to prevent fires igniting; (c) list works that must not be carried out during a total fire ban; (d) include availability of fire suppression equipment, access and water; (e) include procedures for the storage and maintenance of any flammable materials (f) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency; (g) include a figure showing site infrastructure, Asset Protection Zone and the fire fighting water supply; (h) include location of hazards (physical, chemical and electrical) that may impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations; (i) include details of the location, management and maintenance of the Asset Protection Zone and who is responsible for the maintenance and management of the Asset Protection Zone; (j) include bushfire emergency management planning; (k) include details of the how RFS would be notified, and procedures that would be implemented, in the event that: • there is a fire on-site or in the vicinity of the site; • there are any activities on site that would have the potential to ignite surrounding vegetation; or • there are any proposed activities to be carried out during a bushfire danger period. Following approval, the Applicant must implement the Emergency Plan.	
Waste		
28.	The Applicant must: (a) minimise the waste generated by the development; (b) classify all waste generated on site in accordance with the EPA's *Waste Classification Guidelines 2014* (or its latest version); (c) store and handle all waste on site in accordance with its classification; (d) not receive or dispose of any waste on site; (e) and remove all waste from the site as soon as practicable, and ensure it is sent to an appropriately licensed waste facility for disposal.	CEMP
Decommissioning And Rehabilitation		

<table>
<tr><th>Condition No.</th><th>Condition</th><th>Addressed</th></tr>
<tr><td>29.</td><td>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.

Table 3: Rehabilitation Objectives
<table><tr><th>Feature</th><th>Objective</th></tr><tr><td>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 (at least Class 3 Land Capability for areas of mapped Biophysical Strategic Agricultural Land)</td></tr><tr><td>Community</td><td>• Ensure public safety at all times</td></tr></table></td><td>DEMP</td></tr>
<tr><td colspan="3">Schedule 4 Environmental Management And Reporting</td></tr>
<tr><td colspan="3">Environmental Management Strategy</td></tr>
<tr><td>1.</td><td>Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary in writing. This strategy must:</td><td>This Plan</td></tr>
<tr><td></td><td>(a) provide the strategic framework for environmental management of the development;</td><td>Section 1.2 of this EMS</td></tr>
<tr><td></td><td>(b) identify the statutory approvals that apply to the development;</td><td>Section 3 of this EMS</td></tr>
<tr><td></td><td>(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</td><td>Section 4.7 of this EMS</td></tr>
<tr><td></td><td>(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</td><td>Section 8 of this EMS</td></tr>
<tr><td></td><td>(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.</td><td>Section 4.3 of this EMS

Section 10 of this EMS</td></tr>
</table>

Condition No.	Condition	Addressed
	Following the Secretary's approval, the Applicant must implement the Environmental Management Strategy.	
Revision of Strategies, Plans and Programs		
2.	The Applicant must:	Section 11 of this EMS
	(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 7 of Schedule 4; • submission of an audit report under condition 9 of Schedule 4; or • any modification to the conditions of this consent.	
Updating and Staging of Strategies, Plans or Programs		
3.	With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, 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. *Notes:* • *While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.* • *If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.*	Section 11 of this EMS
NOTIFICATIONS **Notification of Department**		
4.	Prior to commencing the road upgrades, construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department via the Major Projects website portal of	Section 8.2.1 of this EMS

Condition No.	Condition	Addressed
	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 commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	
5.	Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including details on the siting of solar panels and ancillary infrastructure.	Section 6 of this EMS Detailed Design plans
Work as Executed Plans		
6.	Prior to commencing operations or following the upgrades of any solar panels or ancillary structure, the Applicant must submit work as executed plans of the development to the Department via the Major Projects website.	Section 6 of this EMS Final design plans
Incident Notification		
7.	The Secretary must be notified via the Major Projects website portal 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.	Section 10.5.1 of this EMS
Non-Compliance Notification		
8.	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 non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	Section 10.5.3 of this EMS
Independent Environmental Audit		
9.	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 *Independent Audit Post Approval Requirements* (Department, 2020) (or equivalent) 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 by the Secretary: i. Within 3 months of commencing construction ii. Within 3 months of commencement of operations; and iii. As directed by the Secretary	Section 10.3 of this EMS

Condition No.	Condition	Addressed
	a) Be carried out in consultation with the relevant agencies b) Assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and c) 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 three 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.	
Access to Information		
10.	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.	Section 12.3 of this EMS

Appendix B Environmental legislation

Act	Activity / aspect	Requirement	Reference	Applicability
General				
Protection of the Environment Operations Act 1997.	Harming the environment.	Do not risk harming the environment by wilfully or negligently: disposing of waste unlawfully causing any substance to leak, spill or otherwise escape (whether or not from a container); or emitting an ozone depleting substance. The works do not trigger the requirement of Environmental Protection Licence under schedule 1.	S115 S116 S117	Yes
Protection of the Environment Operations Act 1997.	Notification of Pollution incidents.	Notify the EPA, NSW Ministry of Health via local Public Health Unit, Safe Work NSW, Local authority and Fire and Rescue NSW immediately of pollution incidents where material harm to the environment is caused or threatened.	S148	Yes
Dangerous Goods (Road and Rail Transport) Act 2008.	Hazards and risks.	Ensure that dangerous goods are transported in a safe manner.	S9	Yes
Pesticides Act 1999.	Hazards and risks.	Use pesticides in an environmentally sensitive manner. Do not use an unregistered pesticide without a permit. Read the label or permit for the pesticide. Use registered pesticides in accordance with instructions on the label. Do not use any restricted pesticide unless authorised	S12 S13 S14 S15 S17	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
		by a certificate of competency or a pesticide control order under the Act. Compliance with pesticide codes of practice is required.		
National Greenhouse and Energy Reporting Act, 2007 and Regulations 2008.	Greenhouse gas emissions.	Accounting and reporting of greenhouse gases produced and energy consumed during construction. Applicability dependent on thresholds.	-	Yes
Privacy and Personal Information Protection Act 1998 (NSW).	Community Liaison.	Legislation relevant to community liaison.	-	Yes
Environmental Planning and Assessment Act 1979.	All	Comply with approved conditions.	Part 4, s4.10	Yes
Water				
Water Management Act 2000. With the exception of controlled activity approvals, the Water Management Act 2000 (WM Act) only applies in relation to those water	Water access and use.	Do not take water from a water source (a lake, river or estuary or place where water occurs naturally on or below the surface of the ground and includes coastal waters) without an access licence. Do not use of water on land (unless supplied by a water utility, irrigation corporation etc. or in accordance with basic landholder rights) without a water use approval.	S56 S60A S89 S 89 S91A	No

Act	Activity / aspect	Requirement	Reference	Applicability
sources covered by operational water sharing plans – these areas cover most of the State's major regulated river systems.				
Protection of the Environment Operations Act 1997.	Water pollution	Do not cause water pollution.	S120 S122	Yes
Noise				
Protection of the Environment Operations Act 1997.	Plant maintenance and operation.	Do not operate plant if it emits noise caused by poor maintenance or operation.	S139	Yes
Protection of the Environment Operations Act 1997.	Materials management.	Do not cause noise by failing to properly and efficiently deal with materials.	S140	Yes
Contaminated soil				
Protection of the Environment Operations Act 1997.	Land pollution.	Do not cause or permit land pollution other than under authority of a licence or regulation (However it is not a land pollution offence to place virgin excavated natural material or lawful pesticides and fertilisers on land, or by placing matter on land that has been notified to the NSW EPA as an unlicensed landfill and which is operated in accordance with the	S142A – S142E	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
		regulations.)		
Contaminated Land Management Act 1997.	Reporting contamination.	Notify the NSW EPA if contaminants exceed thresholds contained in guidelines or the regulations where contamination has entered or will foreseeably enter neighbouring land, the atmosphere, groundwater or surface water. Contaminants in soil are equal to or exceed guideline levels with respect to the current or approved use of the land. Contamination meets other criteria that may be prescribed by the regulations.	S60	Yes
Biodiversity				
Biosecurity Act 2015.	Weed, pest and disease control.	The duty to prevent, eliminate and minimise biosecurity risks posed by biosecurity matters as defined by the Act.	s22 Schedule 1	Yes
Biosecurity Regulation 2017.	Pests and diseases.	Notify the presence any pest or disease listed in Schedule 1 of the Biosecurity Regulation 2014, within 1 working day after suspecting or becoming aware of the pest or disease.	cl. 7, Schedule 1	Yes
Biodiversity Conservation Act 2016.	Threatened flora and fauna.	Do not harm any animal that is; of a threatened species, that is part of a threatened ecological community or is a protected animal, unless authorised under other legislation (e.g. planning approval). Do not damage habitat of a threatened species or ecological community unless authorised under other legislation (e.g. planning approval).	S2.1-2.4 S2.8	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
		Do not damage declared areas of outstanding biodiversity value unless authorised under other legislation (e.g. planning approval). Do not pick a plant that is; of a threatened species, that is part of a threatened ecological community or is a protected plant, unless authorised under other legislation (e.g. planning approval).		
Fisheries Management Act 1994.	Mangroves, seagrasses and marine vegetation.	Do not harm any mangroves, seagrasses or other marine vegetation on public water land protected by the regulations without a permit.	S205	No
Fisheries Management Act 1994.	Fish passage.	Do not block fish passage without a permit.	S219	No, Project is exempt
Environment Protection Biodiversity Conservation Act 1999 (Commonwealth).	Flora and fauna conservation.	Comply with the terms of any EPBC Act approval for the Project.	N/A	Not applicable to this Project as EPBC Approval not required to be obtained.
Waste				
Protection of the Environment Operations Act 1997.	Littering.	Do not litter in a public place or an open private place. Do not litter from a vehicle. Only deposit advertising material in receptacles provided for mail or newspapers or under the door of the premises.	Part 5.6A	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
		Do not deposit advertising material on or in vehicles.		
Protection of the Environment Operations Act 1997.	Waste and transportation.	Do not undertake a scheduled waste activity unless in accordance with an environment protection licence. Refer also to the Resource Recovery Exemptions.	Part 3.2 Schedule 1	Yes
		Only transport waste to a facility that can lawfully accept the waste within 150 km from Project.	S143	Yes
		Do not dispose of waste in a manner that harms or is likely to harm the environment.	S115	Yes
Protection of the Environment Operations (Waste) Regulation 2014.	Waste and transportation.	Comply with general requirements for the transport of waste. For example, any vehicle used by the person to transport waste must be kept in a clean condition and be maintained so as to prevent spillage of waste. For some wastes only licensed transporters can be used.	Regulation cl.49	Yes
	Comply with record keeping requirements in relation to the transport of certain types of waste.	Regulation Part 3.	Yes	Comply with record keeping requirements in relation to the transport of certain types of waste.
Heritage				
Heritage Act 1977.	Heritage.	Do not undertake an activity that will affect a place, building,	S56-57	Yes

Act	Activity / aspect	Requirement	Reference	Applicability
		work, relic, moveable object or precinct which is subject to an Interim Heritage Order or is listed on the State Heritage Register without approval from the Heritage Council.		
		Do not disturb or excavate land with knowledge or reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed; or Do not disturb or excavate land on where a relic has been discovered or exposed unless an excavation permit in place.	S139	No
		Notify the heritage Council on discovery of a relic.	S146	Yes
		Give the Heritage Council at least 14 days' notice before removing or demolishing any item listed in a section 170 register.	S170A	Yes
National Parks and Wildlife Act 1974.	Aboriginal places and objects.	Do not harm or desecrate an Aboriginal object or Aboriginal place without consent.	S86 S90	Yes
	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	S89A	Yes	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal

Act	Activity / aspect	Requirement	Reference	Applicability
				objects.
Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth).	Protection of areas and objects.	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	S20	Yes
	Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.		S22	Yes Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.

Appendix C Environmental Policy

Beon Energy Solutions

Environment Policy

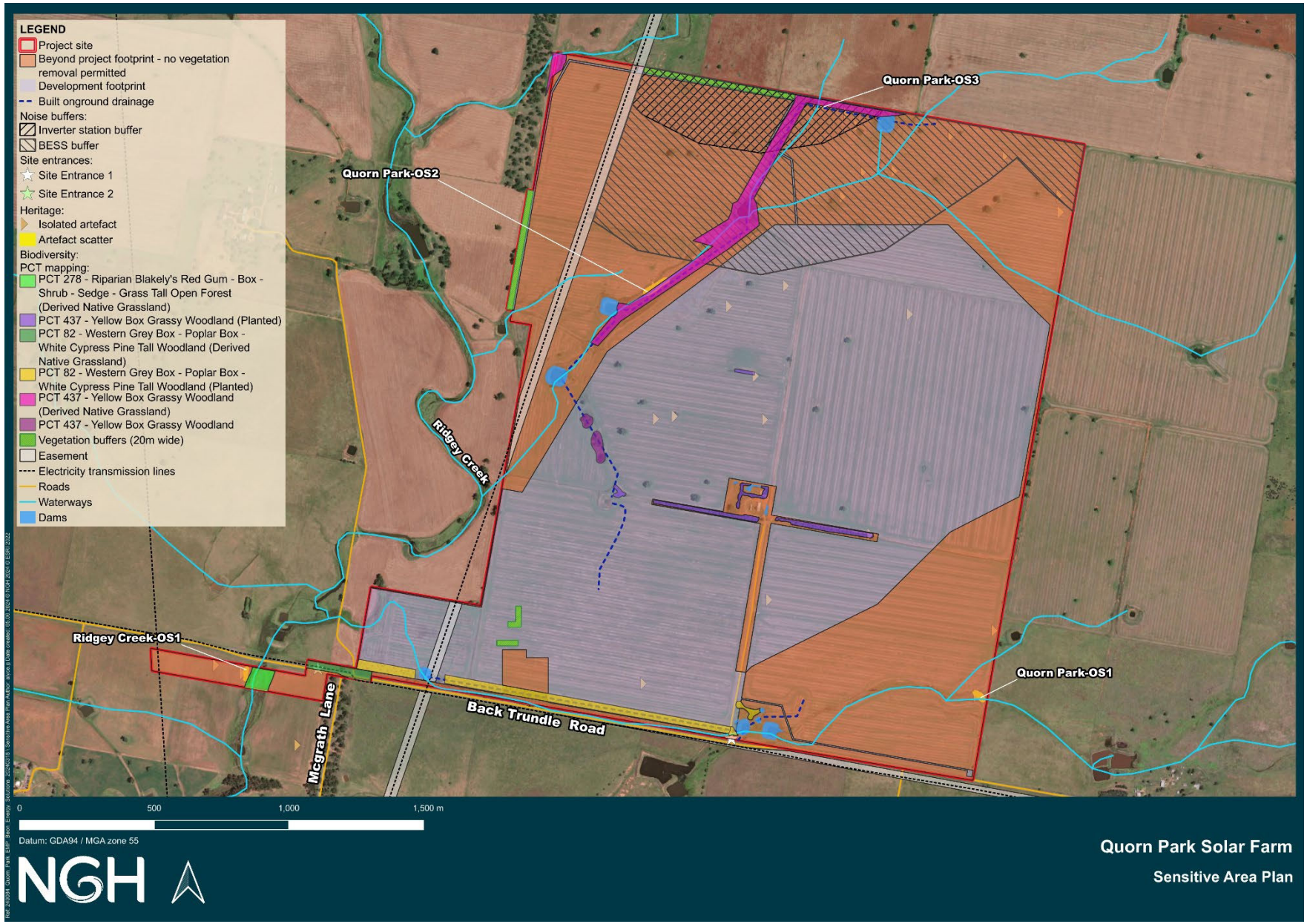
At Beon Energy Solutions, we are conscious of our environmental footprint, strive towards reducing our environmental impact and contribute to the sustainability of our communities.

We achieve this by:

- Implementing and maintaining a robust environmental **management system** across the whole organisation certified to ISO 14001:2015
- **Complying with and monitoring relevant legislation**, applicable standards as well as voluntary commitments
- Providing a **hazard and risk management framework** that identifies and, eliminates or reduces our environmental impacts as far as practicable
- Setting, monitoring, reporting and reviewing environmental **objectives and targets**
- Encouraging **consultation and communication** related to significant environmental impacts of our operations with employees and other stakeholders
- Providing employees & stakeholders with **adequate information, instruction, training or supervision** to ensure they understand their responsibilities and are competent to perform their duty in order to meet our environment obligations
- Providing **appropriate resources**, including internal and external expertise, to manage our environmental impact
- Engaging with suppliers and service providers in order to **manage the environmental impact of our supply chain**
- **Minimising resources use and waste generation** where possible
- Managing environmental **complaints, incidents and near misses** reducing the likelihood of reoccurrence
- Supporting **continual improvement and innovation** in environmental management

Tim Rourke
Chief Executive Officer

Appendix D Sensitive area plans


LEGEND
Project site
Beyond project footprint - no vegetation removal permitted
Development footprint
Built onground drainage
Noise buffers:
Inverter station buffer
BESS buffer
Site entrances:
Site Entrance 1
Site Entrance 2
Heritage:
Isolated artefact
Artefact scatter
Biodiversity:
PCT mapping:
PCT 278 - Riparian Blakely's Red Gum - Box - Shrub - Sedge - Grass Tall Open Forest (Derived Native Grassland)
PCT 437 - Yellow Box Grassy Woodland (Planted)
PCT 82 - Western Grey Box - Poplar Box - White Cypress Pine Tall Woodland (Derived Native Grassland)
PCT 82 - Western Grey Box - Poplar Box - White Cypress Pine Tall Woodland (Planted)
PCT 437 - Yellow Box Grassy Woodland (Derived Native Grassland)
PCT 437 - Yellow Box Grassy Woodland
Vegetation buffers (20m wide)
Easement
Electricity transmission lines
Roads
Waterways
Dams
Quorn Park-OS3
Quorn Park-OS2
Ridgey Creek
Ridgey Creek-OS1
Mcgrath Lane
Back Trundle Road
Quorn Park-OS1
0
500
1,000
1,500 m
Datum: GDA94 / MGA zone 55
NGH
Quorn Park Solar Farm
Sensitive Area Plan

Appendix E Unexpected Finds Protocol

Introduction

This unexpected find protocol has been developed to provide a method for managing unexpected non-Aboriginal (historic) and Aboriginal heritage items identified during construction, maintenance, operation and decommissioning of the Project. The unexpected find protocol has been developed to ensure the successful delivery of the Project while adhering to the NSW *National Parks and Wildlife Act 1974* (NPW Act) and the *Heritage Act 1977* (Heritage Act).

All Aboriginal heritage objects are protected under the NPW Act Under Part 6 of the Act, though in a State Significant Development (SSD) Consolidated Development Consent may be issued that allows for conditional harm to Aboriginal objects. However, there are some circumstances where despite undertaking appropriate heritage assessment prior to the commencement of works Aboriginal cultural heritage items or places are encountered that were not anticipated that may be of scientific and/or cultural significance.

Therefore, it is possible that unexpected heritage items may be identified during construction, operation, upgrade, decommissioning and maintenance works. If this happens the following unexpected find protocol will be implemented to avoid breaching obligations under the NPW Act. This unexpected find protocol provides guidance as to the circumstances under which finds may occur and the actions subsequently required.

What is a Heritage unexpected find?

An unexpected heritage find is defined as any possible Aboriginal or non-Aboriginal heritage object or place, that was not identified or predicted by the Project's heritage assessment and may not be covered by appropriate permits or the Consolidated Development Consent conditions. Such finds have potential to be culturally significant and may need to be assessed prior to development impact.

Unexpected heritage finds may include:

- Aboriginal stone artefacts, shell middens, modified trees, mounds, hearths, stone resources, rock shelters, rock art and stone arrangements;
- Human skeletal remains; and
- Remains of historic infrastructure and relics.

Aboriginal heritage places or objects

All Aboriginal objects are protected under the NSW *National Parks and Wildlife Act 1974* (NPW Act). An Aboriginal object is defined as: *Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons on non-Aboriginal extraction and includes Aboriginal remains.*

All Aboriginal objects are protected, and it is an offence to harm or desecrate an Aboriginal object or place.

Unexpected find management procedure

In the event that any unexpected Aboriginal heritage places or objects or any substantial intact historic archaeological relics that may be of State or local significance are unexpectedly discovered during the Project, the following management protocols will be implemented. **Note: this process does not apply to human or suspected human remains. Follow *Section Human Skeletal Remains* below if remains or suspected remains are encountered.**

1. Works within the immediate identified heritage location will cease. Personnel should notify their supervisor of the find, who will notify the project manager.
2. Establish whether the unexpected find is located within an area covered by the approved development footprint, as per the Consolidated Development Consent, or not.
3. **If the unexpected find is determined to be covered under the existing approved area of the development footprint, as per the Consolidated Development Consent for the Project, undertake the following steps:**
    (a) Establish an appropriate buffer to allow for the assessment and management of the find. All site personnel will be informed about the buffer zone with no further works to occur within the buffer zone until notified.
    (b) A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered and undertake appropriate salvage (generally surface collection) of the site/object, if required, in line with the mitigation methods noted in this HMP. An AHIMS site card may be completed or updated on the discovery of the newly identified Aboriginal objects / Aboriginal heritage items. Should the object(s) / heritage items be salvaged (within the approved development footprint as per the Consolidated Development Consent for the Project) an Aboriginal Site Impact Recording Form must also be completed and submitted to AHIMS.
        - Salvage of Aboriginal heritage items would not include scarred trees. If previously unidentified scarred trees are identified, further consultation with Heritage NSW and Aboriginal stakeholders would need to be undertaken regarding management as avoidance is the preferred mitigation method for scarred trees.
    (c) Following appropriate salvage of the unexpected find works may continue at this location when notified by the project archaeologist or heritage specialist.
4. **If the unexpected find is not covered under the existing approved development footprint, as per the Consolidated Development Consent for the Project, undertake the following steps:**
    (a) All works at this location must cease.
    (b) An appropriate buffer zone of at least 20 metres to allow for the assessment and management of the find must be established. All site personnel will be informed about the buffer zone with no further works to occur until notified. A temporary exclusion area would be established around this buffer zone.
    (c) A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered. Registered Aboriginal Party representatives will also be engaged (if available) to assess the cultural significance of the place or object.
    (d) The discovery of an Aboriginal object will be reported to the local office of Heritage NSW and works will not recommence at the heritage place or object until advised to do so by Heritage NSW. A site card will be completed and submitted to AHIMS for registration.

(e) If the unexpected find can be managed *in situ*, works at the location will not recommence until appropriate heritage management controls have been implemented, such as protective fencing.

If the unexpected find cannot be managed *in situ*, works at the heritage location will not recommence until further assessment is undertaken and appropriate permits and approvals to impact Aboriginal cultural heritage are approved and issued by Heritage NSW.

Unexpected human skeletal remains

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately. The following plan describes the actions that must be taken in instances where human remains, or suspected human remains are discovered. Any such discovery at the activity area must follow these steps.

Discovery:

- If any human remains or suspected human remains are found during any activity, works in the vicinity **must** cease and the Project Manager must be contacted immediately.
- The remains must be left in place and protected from harm or damage. To protect the remains until their origins can be determined high visibility markers or temporary fencing which will not cause ground disturbance must be immediately placed a minimum of 10m around the location of the human remains or suspected human remains by site personnel. A minimum no work buffer zone radius of 50m must be implemented around the remains by taping off the area as an environmental sensitive zone.
- All personnel should then leave the fenced off area immediately.
- The Environmental Officer is responsible to ensure that these temporary measures are implemented onsite within 24 hours of identification.

Notification:

- The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant authorities.
- If there are reasonable grounds to believe that the remains are Aboriginal, the following must also occur:
  - Heritage NSW must be contacted as soon as practicable, and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555.
  - The relevant Aboriginal community groups must be notified immediately when the remains are confirmed to be Aboriginal, as advised by Heritage NSW.
  - The relevant Project Archaeologist may be contacted to facilitate communication between the police, Heritage NSW and Aboriginal community groups.

Process:

- If the remains are considered to be Aboriginal by the Police and Heritage NSW no work can recommence at the particular location unless authorised in writing by Heritage NSW
- Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of, a specialist physical anthropologist or other suitably qualified person.

- Archaeological reporting of Aboriginal ancestral remains must be undertaken by, or reviewed by, a specialist physical anthropologist or other suitably qualified person, with the intent of using respectful and appropriate language and treating the ancestral remains as the remains of Aboriginal people rather than as scientific specimens.

If the remains are considered to be Aboriginal by the Police and Heritage NSW, an appropriate management and mitigation, or salvage strategy will be implemented following further consultation with the Aboriginal community and Heritage NSW.

NGH Pty Ltd

NSW • ACT • QLD • VIC

ABN 31 124 444 622 ACN 124 444 622

E: ngh@nghconsulting.com.au

BEGA

Suite 11, 89-91 Auckland Street
(PO Box 470)
Bega NSW 2550

T. (02) 6492 8333

BRISBANE

T3, Level 7, 348 Edward Street
Brisbane QLD 4000

T. (07) 3129 7633

CANBERRA

Unit 8, 27 Yallourn Street
(PO Box 62)
Fyshwick ACT 2609

T. (02) 6280 5053

GOLD COAST

2B 34 Tallebudgera Creek Road
Burleigh Heads QLD 4220

T. (07) 3129 7633

MELBOURNE

Level 14, 10-16 Queen Street
Melbourne VIC 3000

T: (03) 7031 9123

NEWCASTLE - HUNTER & NORTH COAST

Level 1, 31-33 Beaumont Street
Hamilton NSW 2303

T. (02) 4929 2301

SUNSHINE COAST

Building 1, 30 Chancellor Village Boulevard
Sippy Downs QLD 4556

T: 13 54 93

SYDNEY REGION

Unit 17, 21 Mary Street
Surry Hills NSW 2010

T. (02) 8202 8333

TOWNSVILLE

Level 4, 67-75 Denham Street
Townsville QLD 4810

T. (07) 4410 9000

WAGGA WAGGA - RIVERINA & WESTERN NSW

35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

T. (02) 6971 9696

WODONGA

Unit 2, 83 Hume Street
(PO Box 506)
Wodonga VIC 3690

T. (02) 6067 2533