

LIDDELL BATTERY AND BAYSWATER ANCILLARY WORKS

INDEPENDENT ENVIRONMENTAL
AUDIT

for AGL Macquarie Pty Limited

5 May 2023



DOCUMENT CONTROL

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LIMITATIONS OF REPORT

In preparing this Independent Environmental Audit on behalf of AGL Macquarie Pty Limited, James Bailey and Associates has assessed all activities appropriate and necessary to evaluate the environmental status of the site during the audit period. James Bailey and Associates has addressed all technical matters which might reasonably be considered to be relevant to such an audit conducted to standards which apply in New South Wales. Based on discussions with appropriate staff and a review of available documentation, it is James Bailey and Associates' opinion that the potential critical environmental issues associated with the site and operations are those discussed in this report. However, James Bailey and Associates can only advise on the basis of the information available to them and therefore cannot dismiss absolutely the possibility that parts of the site, or adjacent properties, may give rise to additional issues.

The conclusions presented in this report are professional opinions based solely upon James Bailey and Associates' interpretation of the documentation reviewed, interviews and conversations with personnel knowledgeable about the site and other available information, as referenced in this report. These conclusions are intended exclusively for the purposes stated herein, at the site listed, and for the project indicated.

This report does not, and does not purport to, give legal advice on the actual or potential environmental liabilities of any individual or organisation, or to draw conclusions as to whether any particular circumstances constitute a breach of relevant legislation.

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1. INTRODUCTION

1.1 BACKGROUND

James Bailey & Associates (JBA) has been commissioned by AGL Macquarie Pty Limited (AGL) to conduct an Independent Environmental Audit (IEA) of the Liddell Battery and Bayswater Ancillary Works (SSD 8889679).

AGL owns and operates the Bayswater Power Station (Bayswater), Liddell Power Station (Liddell), Hunter Valley Gas Turbines and associated ancillary infrastructure systems. Liddell and Bayswater are located approximately 25 kilometres (km) north west of Singleton, 15 km south east of Muswellbrook and 165 km north west of Sydney. The project is located within the Singleton and Muswellbrook Local Government Areas (LGAs) and located within an area dominated by mining and power generation.

State Significant Development (SSD) 8889679 provides for the following activities:

- Construction and operation of a Battery Energy Storage System with a capacity of up to 500 MW and 2 GWh;
- Decoupling works to facilitate the separation of the Bayswater Power Station from the Liddell Power Station; and
- Upgrades to ancillary infrastructure required for the ongoing operation of the Bayswater Power Station.

SSD 889679 was approved subject to conditions on the 8 March 2022 by the Director Resources Assessments in accordance with Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). **Figure 1** shows the layout of the Project as approved under SSD 889679.

The IEA has been conducted generally in accordance with the NSW DPIE 'Independent Audit Post Approval Requirements May 2020' (IEA Guidelines).

1.2 AUDIT TEAM

The IEA was completed by Dorian Walsh (Certified Auditor Certificate Number: 201881) and Tegan Brown of JBA. No specialist sub-consultants were required to assist with the IEA.

A copy of the Department of Planning and Environment (DPE) endorsement of the IEA team is included in **Appendix A**. The Independent Environmental Audit Report Declaration for this IEA is included as **Appendix B**.

1.3 AUDIT OBJECTIVES

The IEA assesses AGL's activities during the audit period (see **Section 1.5**) and compliance with key regulatory approvals for the Project. The IEA assessed the status of conditions and commitments from:

- SSD 8889679; and
- SSD 8889679 management plans, strategies and programs.

1.4 AUDIT SCOPE

The IEA scope is defined under Schedule 2, Conditions C13 - 18 of SSD 8889679 which is reproduced below in **Table 1**.

1.5 AUDIT PERIOD

The IEA covers the period from 1 September 2022 (commencement date of activities approved under SSD 8889679) to 22 December 2022, the date of the audit site visit (the audit period).

Table 1 SSD 8889679 IEA Requirements

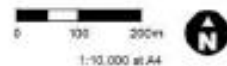
Condition	Requirement	Report Section
Schedule 2 Condition C13	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020, or its latest version).	This IEA report
Schedule 2 Condition C14	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Section 1.2 and Appendix A
Schedule 2 Condition C15	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020, or its latest version), upon giving at least 4 weeks' notice (or timing) to the Applicant of the date upon which the audit must be commenced.	N/A; no requests made by DPE to change IEA frequency
Schedule 2 Condition C16	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020, or its latest version), the Applicant must:	Note only
Schedule 2 Condition C16 (a)	review and respond to each Independent Audit Report prepared under condition C13 of this approval, or condition C15 where notice is given by the Planning Secretary;	This IEA report; AGL to complete response to DPE
Schedule 2 Condition C16 (b)	submit the response to the Planning Secretary; and	N/A; AGL to complete
Schedule 2 Condition C16 (c)	make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	N/A; AGL to complete
Schedule 2 Condition C17	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	N/A; AGL to complete
Schedule 2 Condition C18	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	N/A

Figure 1 SSD 8889679 Project Layout



Legend

- | | | |
|-------------------------------|---|------------------------------|
| Battery energy storage system | Indicative cable connection point (for discussion with TransGrid) | Species impact |
| Decoupling area | Indicative 330kV cable route | PCT impact - offset required |
| Former coal yards area | Transformer yard relocation | Road |
| | Indicative battery block footprint | Waterway |
| | | Waterbody |



Data sources
 Jacobs 2021
 JCB, 2009
 ©Department of Planning,
 Service and Innovation Aug 2009

Imagery
 © Department of Customer Service 2020
 GDMS 10248

2. AUDIT METHODOLOGY

2.1 OVERVIEW

This IEA was undertaken in accordance with the requirements of SSD 8889679 (see **Section 1.4**) and the IEA Guidelines. **Appendix A** includes a copy of DPE endorsement for the IEA team (see **Section 1.2**) and confirmation over audit requirements.

The compliance status of AGL activities during the audit period was determined by assessment of key approval documents regulating site activities (see **Section 3.1**) and a desktop review of all plans, strategies, programs, monitoring data and correspondence relevant to the audit period. The desktop review was used as a basis for this IEA report and identified potential compliance issues that were verified during the site inspection and in interviews with key AGL personnel.

The audit methodology also included consultation with NSW DPE, Environment Protection Authority (EPA), Muswellbrook Shire Council (MSC) and Singleton Council to seek any specific environmental issues that should be a focus of the IEA (see **Section 2.5**).

2.2 IEA PREPARATION

Preparation of the IEA involved:

- Submission of an information request to AGL for the provision of evidence to verify the compliance status of AGL activities during the audit period;
- Engagement with key regulatory agencies for the Facility regarding any specific issues that should be a particular focus of the IEA;
- Submission of an audit agenda to AGL (see **Appendix E**) and confirmation over the scope of the site inspection component of the IEA;
- Desktop review of documentation provided by AGL to determine the compliance status of approval and licencing conditions, identify good site practice and opportunities for improvement, in accordance with the requirements of the IEA Guidelines; and
- Preparation of compliance tables and protocols for the site inspection, including a checklist of specific regulatory requirements obtained from documents provided.

2.3 COMPLIANCE EVALUATION

The IEA consisted of a detailed desktop review of approval documentation and a site inspection. The findings of this IEA were based on verifiable evidence collected by:

- Review of documentation provided by AGL (including document reference, revision numbers, dates and authors);
- Interviews with key site personnel; and
- Inspection of the Liddell Battery and Bayswater Ancillary Works site, activities and processes on 22 December 2022. Selected images taken during the site inspection are included as **Appendix F**.

James McNamara was the primary contact for the audit and was present during the audit site inspection. A list of the key documentation reviewed for the IEA is found in **Section 3.1**. The evidence that was used to determine the compliance status with respect to each condition has been documented in the tables provided in **Appendix C**, along with relevant observations, notes and recommended opportunities for improvement.

2.4 SITE INSPECTION

A physical site inspection of SSD 8889679 construction activities completed during the audit period was conducted on 22 December 2022 and undertaken to ensure that all aspects of environmental management and performance of the Project were reviewed.

At the time of audit, AGL had commenced construction of the Decoupling Works for Liddell Power Station. Development of other activities approved under SSD 8889679 had not commenced during the audit period.

2.4.1 Opening Meeting

The IEA site inspection commenced with an opening meeting; attendees included Dorian Walsh (JBA), Tegan Brown (JBA), James McNamara (AGL), Todd Harris (AGL) and Keith Simkin (AGL). The briefing included clarification of the audit objectives, scope, resources required and the methodology of the IEA.

2.4.2 Site Overview and Orientation Session

An orientation session was conducted by AGL site personnel to provide JBA with a general overview of the Project and its surroundings, an indication of the environmental setting, near neighbours, safety and emergency requirements and known environmental issues.

2.4.3 IEA Interviews

The IEA included interviews with key AGL and AGL contract personnel involved with the management and operation of the Project. The IEA interviews during the site inspection were conducted to assist with verifying the compliance status of the Project. AGL employees interviewed as part of the IEA included:

- James McNamara (Senior Environment Advisor);
- Todd Harris (Senior Project Manager); and
- Keith Simkin (Contractor, Environmental Operations).

2.4.4 Focused Site Inspection

A focused site inspection was conducted following the initial site overview and opening meeting. The purpose of the site inspection was to focus on specific operation and environmental aspects of the Project and to assess AGL environmental management systems and performance in detail.

2.4.5 Site Documentation Review

Relevant site documentation was reviewed with AGL personnel during the site inspection interviews to verify compliance. Key documents reviewed included SSD 8889679, monitoring results, correspondence with regulatory agencies, Environmental Management Plans and procedures.

2.4.6 Follow Up Auditing

Follow up interviews and document reviews were conducted to clarify any outstanding compliance issues to be resolved prior to inclusion in the final IEA report.

2.4.7 Exit Briefing

An exit briefing was conducted prior to JBA departure from the site. Attendees of exit briefing included Dorian Walsh, Tegan Brown, James McNamara, Todd Harris and Keith Simkin. The exit meeting included findings of the preliminary audit, recommendations and explanation of actions required by AGL and by JBA to complete the audit process required under the IEA Guidelines.

2.5 AUDIT CONSULTATION

Correspondence was sent to the DPE, EPA, MSC and Singleton Council requesting their input into the scope of the IEA. Responses were received from MSC and Singleton Council (see **Appendix D**), with comments provided in **Table 2**.

Table 2 Feedback from Regulatory Consultation

Comment	Response
Muswellbrook Shire Council	
Confirmation if there is a date for commencement of Stage 2 (Liddell battery energy storage system and associated works) and Stage 3 (Bayswater Ancillary Works and consolidated consents)	AGL advised of a tentative commencement date for Stage 2 of the project of 1 December 2023. AGL have not set a forecast commencement date for Stage 3 of the project at the time of audit.
The number of construction employees currently employed	AGL confirmed that the current SSD 8889679 construction workforce is 15 persons.
Confirmation that the relevant biodiversity credits for Stage 1 Decoupling Works have been offset (see excerpt below from the EMS), including a description of how they were offset	AGL confirmed that disturbance of native vegetation requiring the retirement of biodiversity offset credits for the Stage 1 of the project did not occur during the audit period. As such, credits have not yet been secured.
An audit against the visual and lighting management measures as outlined in Table 20 of the EMS	A review of the implementation of visual and lighting mitigations described in the approved SSD 8889679 Environmental Management Strategy (EMS) indicated that controls relevant to the Decoupling construction works were being implemented during the audit period. However, non-compliances regarding the planning for retention of landscape features and visual integration of structures to be developed during future SSD 8889679 project works were identified (see Section 3 , Section 4 and Appendix C).
Evidence that AGL have "Identified opportunities to maximise the use of local suppliers and businesses in the provision of goods and services" as committed to in Table 22 of the EMS	JM (pers comms) confirmed that AGL use local sub-contractors to perform project work, as described in the SSD 8889679 EMS.
An audit against the Contamination Management Plan as part of the EMS	The EMS includes an associated Contamination Management Plan. A review of the implementation of mitigation measures identified in the Contamination Management Plan indicated that these were being applied to construction work during the audit period. AGL have not identified any additional site contamination issues for the project during the audit period.

Comment	Response
<p>Note that the link to the complaints register on the AGL website is not working properly</p>	<p>Noted. Comments on this non-compliance are included in SSD 8889679 Schedule 2, Condition C1 of Appendix C and listed in Section 3 and Section 4.</p>
Singleton Council	
<p>The conditions of approval for SSD 8889679, requires the retention of Council imposed conditions as specified in Part D. Council would like to be informed of any contamination that arises due to the implementation of these conditions.</p>	<p>Comments on AGL compliance with the Singleton Council approvals listed in Part D of SSD 8889679 are included in Appendix C, with identified non-compliances and recommendations noted in Section 3 and Section 4.</p> <p>AGL have developed an EMS for the SSD 8889679, which includes an associated Contamination Management Plan. AGL have not identified any additional site contamination issues for the project during the audit period.</p>
<p>Additionally, the conditions of approval for SSD 8889679, require the Applicant to create and Environmental Management Strategy to keep the community, including the Council, informed of the operation and environmental performance of the development.</p>	<p>AGL have prepared an EMS for the project, which was approved by DPE on 31 August 2022.</p> <p>Comments on AGL compliance with the requirements of the EMS are included in SSD 8889679 Schedule 2, Condition C1 of Appendix C, with identified non-compliances and recommendations noted in Section 3 and Section 4.</p>
<p>Council would expect that the audit will include evidence to support the compliance status of these conditions of approval, and of interest to Council, evidence to support the following:</p> <ul style="list-style-type: none"> Whether the various rehabilitation management and closure planning objectives/ plans/ strategies required under the various consents align to local, regional and State strategic land use planning documents, including whether these documents incorporate final land use outcomes consistent with these strategic land use planning documents. 	<p>Comments on AGL compliance with the requirements of the EMS are included in SSD 8889679 Schedule 2, Condition C1 of Appendix C, with identified non-compliances and recommendations noted in Section 3 and Section 4.</p> <p>Schedule 2, Condition B28 of SSD 8889679 requires that the project is rehabilitated to the satisfaction of DPE and provides associated rehabilitation objectives. Decommissioning and rehabilitation works required for SSD 8889679 have not commenced at the time of audit.</p>

2.6 COMPLIANCE STATUS DESCRIPTORS

The compliance status of each condition reviewed during the IEA was assessed based on evidence provided and determined in accordance with the descriptors provided in the IEA Guidelines. No other terms have been used to describe the compliance status of conditions within this IEA.

3. AUDIT FINDINGS

3.1 APPROVAL AND DOCUMENT LIST

AGL documentation for the IEA was sighted during a detailed desktop review and the audit site inspection of 22 December 2022. Approvals and documents assessed during the audit were related to:

- SSD 8889679 approval conditions;
- SSD 8889679 Statement of Commitments;
- SSD 8889679 environmental management plans and procedures;
- AGL environmental monitoring data; and
- AGL correspondence with regulatory agencies and other records of consultation.

The tables included in **Appendix C** discuss the documentation that was used to determine compliance with the conditions of the Projects approvals and licensing assessed during the IEA.

3.2 COMPLIANCE PERFORMANCE

Table 3 provides a summary of compliance for key AGL approvals and licensing during the audit period. A description of each identified non-compliance is provided in **Section 3.4** and **Appendix C**.

Table 3 Summary of Compliance

Document	C	NC	NT	Note	Total
SSD 8889679	23	10	31	5	69
SSD 8889679 Statement of Commitments	30	19	19	-	68

3.3 SUMMARY OF AGENCY NOTICES AND ORDERS

No notices, orders, penalty notices or prosecutions in relation to SSD 8889679 were issued to AGL during the audit period.

3.4 NON-COMPLIANCES DURING THE AUDIT PERIOD

Table 4 lists the non-compliances identified during the audit period. Recommendations made in relation to these non-compliances are provided in **Section 4**, with further context provided in **Appendix C**.

Table 4 IEA Non-Compliances

Ref	Non-Compliance
SSD 8889679	
Schedule 2, Condition A2	Non-compliances with SSD 8889679 conditions were identified during this IEA and described below and in Appendix C .
Schedule 2, Condition B12(a)	Records were not available at the time of audit to confirm that monitoring described in Section 7 of the NMP had been completed to verify that project noise impacts against modelling predictions.

Ref	Non-Compliance
Schedule 2, Condition B12(b)	No evidence was available at the time of the audit to confirm that reasonable and feasible steps to minimise noise from construction and operational activities have been implemented for the project.
Schedule 2, Conditions C1(d), C19(a), C19(b)	A current copy of the complaints register was not available on the AGL website at the time of the audit. It is recommended that the project complaints register is regularly updated and made available on the AGL website.
Schedule 2, Condition C14	Written approval from DPE for JBA to complete the audit occurred after commencement of this IEA.
Schedule 2, Condition C17	IEA report and AGL response has exceeded the two-month requirement for submission to the Planning Secretary.
Schedule 2, Condition D1	No evidence was available at the time of the audit to confirm the development of the Low Pressure Pump Station Stabilisation was undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the GHD (2018) <i>Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report</i> .
Schedule 2, Condition D3	No evidence was available at the time of the audit to confirm the development of the Ravensworth Coal Unloader Facility was carried out in accordance with HLA Envirosciences (1997) <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> .
Schedule 2, Condition D4	No evidence was available at the time of the audit to confirm AGL has liaised with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line.
Schedule 2, Condition D6	No evidence was available at the time of the audit to confirm the development of the Coal/Rail Unloader Augmentation was carried out generally in accordance with DA 401_2000 and accompanying HLA Envirosciences (2000) <i>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</i> .
SSD 8889679 EIS Commitments	
HR2	No evidence was available at the time of the audit that confirms design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels.
HR3	Evidence that a Management of Change Process was completed for the project was not available at the time of audit.
HR6	No evidence was available at the time of the audit to confirm that all staff have been trained the use of the spill kits in place at the project construction area.
AQ2	Evidence was not available at the time of the audit to confirm dust mitigation controls are implemented during the loading and unloading of materials.
AQ3	No evidence was available at the time of the audit to confirm that regular inspection and removal of debris from plant and equipment is occurring for the project.
AQ5	Evidence was not available at the time of the audit to confirm that management of cumulative dust impacts has been considered between AGL and WOAOW project team.

Ref	Non-Compliance
TT1	The Traffic Management Plan notes that the haulage contractor will prepare and implement a CTMP for oversized overmass vehicle movements, which was not available at the time of the audit.
TT2	Copies of oversized vehicle permits were not available at the time of the audit.
BIO8	No evidence was available at the time of the audit that confirmed machinery or personnel avoid entering areas of significant weed infestations.
BIO9	Evidence of weed control for the project was not available at the time of the audit.
BIO10	The EMS notes that the CEMP will detail the procedures for management of weeds on the development site, however a copy of the CEMP was not available at the time of the audit.
BIO11	Evidence was not available at the time of the audit to confirm that vehicle and machinery hygiene measures have been applied during construction.
BIO12	The EMS notes the CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases, however a copy of the CEMP was not available at the time of the audit.
V1	Detailed designs for the project were not available at the time of the audit to confirm that retention and enhancement of existing landscape features (areas of scrub, individual trees) was considered.
V2	Detailed designs that confirm colour proposed for permanent infrastructure were not available at the time of the audit.
V3	Detailed designs that confirm the consideration of minimal use of reflective surfaces was not available at the time of the audit.
SE3	Evidence was not available at the time of audit to confirm that consultation has occurred with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.
I2	No evidence was available at the time of the audit to confirm that AGL has consulted with Ausgrid regarding continued supply as a result of the project.
CL1	A process to review and update management measures if any other development commences in proximity to the Project is not included in any management plan for the Project.

3.5 ENVIRONMENTAL PERFORMANCE

3.5.1 Site Inspection Summary

The site inspection of 22 December 2022 included a review of the site of the Decoupling Works component of SSD 8889679, as shown on **Figure 1**. Development of other components of the SSD 8889679 project had not commenced during the audit period. Selected images taken during the site inspection are included as **Appendix F**.

The site inspection found that the Decoupling Works construction site is being maintained to a high standard, with clear delineation of project work areas. Waste generated from the project is being segregated into separate skip bins for removal from site. Waste Management for the project is further described in **Section 3.5.3**.

Chemicals being used for the project are stored in appropriate bunded areas and suitable equipment to respond to any spills or fires on site were identified during the site inspection. This included portable fire extinguishers which are tagged six monthly.

3.5.2 Environmental Management Documents

The adequacy of AGL environmental management documents for the project and the implementation of these plans was reviewed as a component of this IEA.

In general, the review of the environmental management documentation found that AGL is operating to a good level of compliance with the environmental procedures and systems required under SSD 8889679. Management plans reviewed included the approved SSD 8889679 EMS and sub-plans, Aboriginal Cultural Heritage Management Plan (ACHMP), Air Quality Management Plan (AQMP), Construction Noise Management Plan, Contamination Management Plan, Soil and Water Management Plan, Traffic Management Plan and Waste Management Plan.

Non-compliances identified in relation to project management plans are listed in **Table 4**.

3.5.3 Waste Management

Schedule 2, Condition C1 (e) of SSD 8889679 requires AGL to prepare an EMS including a waste management subplan. The desktop review confirmed that a Waste Management Plan has been prepared and approved by the DPE. The Waste Management Plan identifies the key waste issues that require control to manage project waste impacts.

The site inspection found that limited volumes of chemicals and hydrocarbons required for the project were being appropriately stored in a bunded area at the time of the audit. No chemicals for the project were observed to be outside of bunding during the site inspection.

Segregated skip bins were sighted at the time of the site inspection for general waste, recycling and scrap metal.

Emergency spill kits were also available on site at the time of the site inspection.

3.5.4 Operation of Plant and Equipment

Schedule 2, Condition A12 of SSD 8889679 requires all plant and equipment used on site, or in connection with the development, to be maintained in a proper and efficient condition and operated in a proper and efficient manner.

The desktop review and interviews with key AGL personnel confirmed that contractors working on the project complete site inductions which covers safe operation of plant and equipment. The desktop review also confirmed that PBE (the project construction contractor) is completing Safe Work Method Statement (SWMS) and vehicle maintenance inspections for project jobs.

3.5.5 Air Quality

The desktop review confirmed that AGL has prepared an AQMP to identify the potential impacts of the Project construction and detail the controls to be implemented to minimise construction air quality impacts.

No air quality issues were identified at the site during the IEA. The site inspection confirmed that roads were well maintained and that signage is in place on site to limit traffic speed to 40 km/hr to reduce the risk of dust emissions. No elevated dust was observed from material stockpiled within the project construction area.

No offensive odours were detected on site during the IEA site inspection.

Discussions with AGL key personnel confirmed that no complaints have been received during the audit period in relation to air quality impacts from SSD 8889679 construction works.

3.5.6 Aboriginal Heritage

The desktop review confirmed that AGL has developed an ACHMP for the Decoupling Works component of the Project, which has been approved by the DPE. The ACHMP was prepared in consultation with Heritage NSW and Registered Aboriginal Parties (RAPs), as required under Schedule 1, Condition B22 of SSD 8889679.

The ACHMP has been developed to provide protocols to assist AGL personnel and on-site contractors in managing the identified Aboriginal heritage values of the ACHMP area. Interviews with key AGL personnel and the site inspection confirmed that the boundary of SSD 8889679 construction works has been flagged to prevent any disturbance outside the approved footprint.

Section 3 of the ACHMP describes management of Aboriginal cultural heritage values including unanticipated finds protocols for Aboriginal objects, places and human skeletal remains. Discussions with key AGL personnel confirmed that there have been no unexpected finds during clearing within the audit period.

3.5.7 Environmental Incidents

No environmental incidents requiring notification to regulatory agencies were recorded during the audit period.

3.5.8 Environmental Complaints

Discussions with AGL employees found that no community complaints were received regarding the project during the audit period.

3.5.9 Environmental Impact Comparison

A desktop review of the Environmental Impact Statement (EIS) prepared to support SSD 8889679 was completed as part of the IEA to compare AGL documentation and monitoring data for the audit period. A comparison with observed impacts was also undertaken during the site inspection, which found that the site project has been operating generally in accordance with the conditions of SSD 8889679.

The projects EIS noted that during the construction phase of the project, the primary air quality risk would be dust generated from site clearing, materials excavation, handling, transport and placement, as well as from wind erosion of stored materials and exposed surfaces resulting in impacts at surrounding sensitive receivers. The desktop review and site inspection confirmed that adequate mitigation measures have been put in place to minimise the risks of dust emissions.

The EIS also noted that construction would require the use of heavy machinery, which can generate high noise and vibration levels at nearby receivers. The desktop review confirmed that a Construction Noise Management Plan has been developed and implemented by AGL. Discussions with key AGL personnel confirmed that the Decoupling Works completed during the audit period are only completed during approved operation hours and that all plant and equipment for the project are regularly maintained and operated by appropriately qualified personnel.

It is noted within the project EIS that two asbestos samples were associated with the existing ash pipeline. AGL have confirmed that the Decoupling Works would have minimal interaction with the ash pipeline and that the risk of disturbance of known areas of contamination is considered unlikely for the current stage of the project. However, the EIS noted that occupational hygiene controls will be implemented as a precaution to mitigate potential construction worker exposure to asbestos. The desktop review confirmed that AGL have developed and implemented Contamination Management Plan for the project as a sub-plan to the project EMS. AGL also operate under a site-wide Asbestos Management Procedure which outlines responsibilities, procedures/protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos.

The EIS also notes that that during construction, the majority of the project components are largely screened by existing vegetation and topography and are typical of existing infrastructure from publicly accessible locations. Therefore visual impacts during construction would be limited to AGLM personnel and contractors, and construction personnel. The EIS describes construction visual impacts as clearing of vegetation and

stockpiling of debris from construction activities. Discussions with key AGL personnel confirmed that no clearing of vegetation has occurred during the audit period. The site inspection confirmed that the visual appearance of the project blends in as far as possible with the surrounding landscape.

The EIS describes standard construction waste as an expected impact due to Decoupling Works, including spoil from cut and fill activities, green waste from clearing activities, general construction waste and sewage. Discussions with key AGL personnel confirmed that waste is managed under contract and disposed of appropriately at a licenced waste facility. The site inspection confirmed that waste streams generated during project construction activities are being segregated into separate skip bins.

The potential impacts to water quality and hydrology listed within the EIS as a result of construction activities include removal of vegetation, general earthworks, including stripping of topsoil and excavation, stockpiling of topsoil and vegetation leading to the discharge of sediment-laden water, transportation of cut and/or fill materials and the movement of heavy vehicles across exposed earth, potential for spills, concreting works resulting in concrete dust, concrete slurries or washout water entering downstream waterways. The site inspection of the Decoupling Works construction area confirmed that adequate mitigation measures have been put in place to minimise the risks of increased erosion and sedimentation, discharge of sediment-laden water, potential for spills and leaks of chemicals, petroleum, oils and other toxicants.

The review of SSD 8889679 EIS commitments completed for this IEA is detailed in **Appendix C**.

4. RECOMMENDATIONS

A summary of the non-compliances with AGL licences and approvals identified during the audit period is provided in **Table 4**. Recommendations made to respond to these non-compliances, as well as opportunities identified to improve AGL's general environmental performance, are provided in **Table 5**.

Table 5 IEA Recommendations

Ref	Recommendation Description
SSD 8889679	
Schedule 2, Condition A12(a)	It is recommended that maintenance records for all project plant and equipment is retained to confirm these activities are being carried out.
Schedule 2, Condition A12(b)	It is recommended that project SWMS are signed and dated prior to starting the job and that signed copies are retained.
Schedule 2, Condition B12(a)	It is recommended that AGL commission construction noise monitoring for the project, in accordance with Section 7 of the approved NMP. It is also recommended that noise generated by construction for the project is managed in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version and evidence is retained.
Schedule 2, Condition B12(b)	It is recommended that reasonable and feasible steps to minimise noise from construction and operational activities is implemented and evidence is retained.
Schedule 2, Condition B13	It is recommended that the sign in / sign out register is implemented on site and completed copies are retained to confirm compliance with approved construction hours.
Schedule 2, Condition B15	It is recommended that evidence is retained confirming the provision of a water cart for dust suppression during project construction work.
Schedule 2, Conditions B27(a), B27(c)	It is recommended that AGL retains copies of records from the project waste contractor.
Schedule 2, Conditions B27(b)	It is also recommended that AGL ensure project waste is recorded and classified generally in accordance with the <i>EPA Waste Classification Guidelines</i> .
Schedule 2, Conditions C1(d), C19(a)(viii)	It is recommended that the project complaints register is regularly updated and made available on the AGL website.
Schedule 2, Condition C1(d)	Evidence that non-compliances are being entered into AGL 'myHSE' system was not available at the time of the audit. It is recommended that AGL enter any non-compliances into myHSE and records are retained.
Schedule 2, Condition C5	It is recommended that AGL notify DPE of the non-compliances identified in this audit report within seven days of the document date.
Schedule 2, Condition C14	It is recommended that AGL obtains an endorsement letter for the proposed independent audit team from the DPE prior to next audit.
Schedule 2, Condition C17	It is recommended that AGL submit this IEA report and their response to DPE as soon as possible following completion of this audit report.
Schedule 2, Condition C19	It is recommended that all project information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) noted in Schedule 2, Condition C19 are made publicly available on the AGL website.

Ref	Recommendation Description
Schedule 2, Condition D1	It is recommended that AGL retains evidence to confirm that the development of the Low Pressure Pump Station Stabilisation was undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the GHD Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report prior to surrender of the DA 8.2018.273.2 under Schedule 2, Condition A5 of SSD 8889679.
Schedule 2, Condition D3	It is recommended that AGL retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.
Schedule 2, Condition D4	It is recommended that AGL retain evidence that confirms consultation with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.
Schedule 2, Condition D6	It is recommended that AGL retain evidence that confirms the development of the Coal/Rail Unloader Augmentation is carried out generally in accordance with the development application and accompanying plans prior to surrender of the DA 401_2000 under Schedule 2, Condition A5 of SSD 8889679.
SSD 8889679 Commitments	
HR2	It is recommended that AGL documents the design and selection process to ensure all electrical equipment considers EMF levels and complies with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels.
HR3	It is recommended that a Management of Change process is completed for the project, in accordance with the relevant AGL Standard.
HR6	It is recommended that all project staff will be made aware of the location of the spill kit and trained in its use, with training records retained.
AQ2	It is recommended that AGL document the implementation of control measures for project loading and unloading activities.
AQ3	It is recommended that AGL retains evidence that confirms watering of unsealed haulage routes and regular inspection and removal of debris from plant and equipment is occurring for the project.
AQ5	It is recommended that activities are coordinated between the Project and the WOAOW project team to limit the potential for cumulative dust impacts where possible.
AQ6	It is recommended that AGL undertake watering of stockpiles and exposed surfaces to manage wind erosion.
TT1	It is recommended that the haulage contractor prepares and implements a Construction Traffic Management Plan (CTMP) for oversized overmass vehicle movements associated with the project.
TT2	It is recommended that an oversized vehicle permit will be sought for all OSOM movements where required.

Ref	Recommendation Description
BIO ₁	It is recommended that copies of completed site inductions which communicate the location of any 'No Go Zones' are retained.
BIO ₈	It is recommended that AGL ensures that where possible, machinery or personnel avoid entering areas of significant weed infestations.
BIO ₉	It is recommended that any weed control for the project is undertaken by suitably qualified and/or experienced personnel and records are retained.
BIO ₁₀	It is recommended that during the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species and records are retained.
BIO ₁₁	It is recommended that AGL ensures vehicle and machinery hygiene measures are applied during construction and records retained.
BIO ₁₂	It is recommended that project documentation is updated to include a protocol for construction vehicles driving to and from site to prevent the spread or introduction pathogens on site.
V ₁	It is recommended that AGL retain copies of detailed designs for the project that confirms retention and enhancement of existing landscape features.
V ₂	It is recommended that AGL retain copies of Detailed designs that confirm colour proposed for permanent infrastructure.
V ₃	It is recommended that AGL retain copies of detail design documents to confirm the consideration of minimal use of reflective surfaces in project infrastructure.
V ₅	It is recommended that AGL consider mitigation tree and shrub planting to visually integrate the Project within the surrounding landscape and document the findings of this review.
SE ₃	It is recommended that AGL consults with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.
I ₂	It is recommended that AGLM document consultation with Ausgrid regarding continued supply.
CL ₁	It is recommended that a process to review and update management measures if any other development commences in proximity to the Project is included within the project EMS.

APPENDIX A
ENDORSEMENT OF IEA TEAM

Department of Planning and Environment

James McNamara
Senior Environmental Advisor
AGL Macquarie Pty Limited
Wonnarua Country
New England Highway
Muswellbrook NSW 2333

Sent by email only: jmcnamara2@agl.com.au

13/03/2023

Dear Mr McNamara

**Liddell Battery and Bayswater Ancillary Works (SSD-8889679)
Independent Auditor Proposal**

I refer to your request (SSD-8889679-PA-11) for the Secretary's approval of suitably qualified persons to prepare the Independent Environmental Audit (IEA) for the Liddell Battery and Bayswater Ancillary Works.

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of James Bailey & Associates to prepare the 2023 Independent Environmental Audit.

In accordance with Schedule 2 Condition C14 of development consent SSD-8889679 and the Independent Audit Post Approval Requirements (2020), the Secretary has agreed to the following audit team:

- Dorian Walsh, lead auditor
- Tegan Brown, assisting auditor

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

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

Should you wish to discuss the matter further, please contact Jennifer Sage on 0400 245 170 or compliance@planning.nsw.gov.au

Yours sincerely



Heidi Watters
Team Leader Northern
Compliance

As nominee of the Planning Secretary

APPENDIX B
IEA DECLARATION

APPENDIX C
IEA COMPLIANCE TABLES

Table C1 Project Approval SSD 8889679

Cond	Project Approval SSD 8889679	Status	Evidence
SCHEDULE 2: PART A - ADMINISTRATIVE CONDITIONS			
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT			
A1	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.	C	A review of AGL records and inspection of the project site found that reasonable and feasible controls are in place to minimise the potential for material environmental impacts from site operations. Comments on AGL environmental controls are provided under the relevant conditions below.
TERMS OF CONSENT			
A2	The development may only be carried out: (a) in compliance with the conditions of this consent	NC	Non-compliances (NC) with SSD 8889679 conditions were identified during this IEA. Findings and recommendations in relation to each non-compliance are provided against the relevant conditions below.
	(b) in accordance with all written directions of the Planning Secretary	C	JM (pers comms) confirmed that no written directions have been made by DPE.
	(c) generally in accordance with the EIS, and	C	A review of AGL documentation found that the project is being carried out generally in accordance with the EIS.
	(d) generally in accordance with the Development Layout.	C	The site layout is generally consistent with the general development layout shown in Appendix 1 of SSD 8889679.
	<i>Note: The general layout of the development is shown in Appendix 1.</i>	NT	Note only.
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:	NT	JM (pers comms) confirmed the Planning Secretary has not made any written

Cond	Project Approval SSD 8889679	Status	Evidence
	(a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and		directions in relation to the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under SSD 8889679.
	(b) the implementation of any actions or measures contained in any such document referred to in paragraph (a).	NT	JM (pers comms) confirmed that the Planning Secretary has not made any written directions in relation to the implementation of any actions or measures contained in documents referred to in Schedule 2, Condition A3 (a).
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and the document/s listed in condition A2(b). In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition A2(b), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	NT	No inconsistencies identified during the audit period.
SURRENDER OF EXISTING CONSENTS			
A5	At a time determined by the Secretary, being no later than 12 months after the date of commencement of development, or other timeframe agreed by the Planning Secretary in writing, the following development consents are to be surrendered in accordance with section 68 of the EP&A Regulation:	NT	JM (pers comms) confirmed that 12 months has not elapsed since the commencement of SSD 8889679. As such, the existing development consents referred to in Schedule 2, Condition A5 have not been surrendered at the time of audit.
	(a) 8/2016 (MSC)	NT	See Schedule 2, Condition A5 above.
	(b) 74/2018 (MSC)	NT	See Schedule 2, Condition A5 above.
	(c) 8.2018.273.1 (SC)	NT	See Schedule 2, Condition A5 above.
	(d) 8.2018.23.1 (SC)	NT	See Schedule 2, Condition A5 above.
	(e) 8.2018.23.2	NT	See Schedule 2, Condition A5 above.
	(f) 54_86 (MSC)	NT	See Schedule 2, Condition A5 above.
	(g) 29_98 (SC)	NT	See Schedule 2, Condition A5 above.

Cond	Project Approval SSD 8889679	Status	Evidence
	(h) 114_2016 (MSC)	NT	See Schedule 2, Condition A5 above.
	(i) 223_2004	NT	See Schedule 2, Condition A5 above.
	(j) 401_2000 (SC)	NT	See Schedule 2, Condition A5 above.
	(k) 460_2001 (SC)	NT	See Schedule 2, Condition A5 above.
	<i>Note: Condition A5 does not extend to the surrender of construction or occupation certificates for existing and proposed building works under former Part 4A or Part 6 of the EP&A Act (as Part 6 applies from 1 September 2018). The surrender required by this condition A5 should not be understood to mean that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i>	NT	Note only.
A6	Upon the date of commencement of development under this consent, and before the surrender of the existing development consents specified in condition 5, the conditions of this consent prevail to the extent of any inconsistency.	C	JM (pers comms) confirmed that the project is operating under SSD 8889679 conditions.
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS			
A7	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);	C	Sighted AGL Letter dated 12 August 2022 made publicly available on the AGL website. The letter requests permission from the Planning Secretary to stage management plans for SSD 8889679 into Stage 1 (Decoupling Works) and Stage 2 (The Battery, Bayswater Ancillary Works and Consolidated Consents). Sighted copy of DPE letter dated 23 August 2022 approving the requested staging of management plans. All construction works completed during the audit period were related to Stage 1 (Decoupling Works) of the project.
	(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and	NT	JM (pers comms) confirmed that no project strategy, plan or program has been combined.

Cond	Project Approval SSD 8889679	Status	Evidence
	<p>(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</p> <p>If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.</p> <p>If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.</p>	NT	JM (pers comms) confirmed that no project strategy, plan or program has been updated.
NOTIFICATION OF COMMENCEMENT			
A8	A8. At least two weeks prior to the commencement of the following activities, the Applicant must notify the Department in writing of the date of:	C	Sighted copy of AGL Notification of commencement of Stage 1 Decoupling Works letter to DPE, dated 12 August 2022. The letter notes that pre-construction activities and physical works are scheduled to commence 1 September 2022.
	(a) physical commencement of the development;	C	See Schedule 2, Condition A8 above.
	(b) pre-construction activities;	C	See Schedule 2, Condition A8 above.
	(c) construction of the battery energy storage system;	NT	JM (pers comms) confirmed that construction of the battery energy storage system has not commenced within the audit period.
	(d) construction of the decoupling works;	C	See Schedule 2, Condition A8 above.
	(e) construction of the Bayswater ancillary works; and	NT	JM (pers comms) confirmed that construction of the Bayswater ancillary works has not occurred within the audit period.
	(f) decommissioning.	NT	JM (pers comms) confirmed that decommissioning has not occurred within the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence
STRUCTURAL ADEQUACY			
A9	A9. 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.	NT	JM (pers comms) confirmed that there has been no construction of new buildings, structures, alterations or additions to existing buildings and structures within the audit period.
	<p>Notes:</p> <ul style="list-style-type: none"> Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the development. 	NT	See Schedule 2, Condition A9 above.
DEMOLITION			
A10	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.	NT	JM (pers comms) confirmed that there has been no demolition works on site during the audit period.
PROTECTION OF PUBLIC INFRASTRUCTURE			
A11	Unless the Applicant and the applicable authority agree otherwise, the Applicant must:	NT	JM (pers comms) confirmed no issues for the project have been identified in relation to damage to public infrastructure.
	<p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p> <p>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.</p>	NT	See Schedule 2, Condition A11 (a) above.
OPERATION OF PLANT AND EQUIPMENT			
A12	The Applicant must ensure that all plant and equipment used on site, or in connection with the development, is:	C	JM (pers comms) confirmed that plant and equipment used on site is serviced regularly.
	<p>(a) maintained in a proper and efficient condition; and</p>		Viewed example of CPC (project contractor) 'Plant & Equipment Prestart Check List' dated 16 December 2022. Prestart form includes sections to identify equipment is operating effectively prior to

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>use.</p> <p>It is recommended that records for all project plant and equipment is retained to confirm maintenance is being carried out.</p>
	(b) operated in a proper and efficient manner.	C	<p>Sighted a copy of Safe Work Method Statement (SWMS) for site mobilisation which was prepared by the Construction Manager (PBE). The SWMS copy has not been signed or dated by personnel.</p> <p>It is recommended that SWMS are signed and dated prior to starting the job and that signed copies are retained.</p> <p>Sighted copy of the PBE Plant and Machinery Onsite Management Procedure dated 20 May 2021. The procedure describes safe working practices to manage the risk of plant in the workplace at PBE construction sites.</p> <p>Sighted a copy of the PBE Light Vehicle Onsite Management Procedure dated 20 May 2021. The procedure provides guidance for personnel who are required to operate road registered light vehicles on PBE construction worksites.</p>
SCHEDULE 2: PART B - GENERAL ENVIRONMENTAL CONDITIONS			
BATTERIES			
Battery Storage Restriction			
B1	<p>The battery energy storage system or systems associated with the development must not exceed a total delivery capacity of 500 MW or a storage capacity of 2 GWh.</p> <p>Note: <i>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.</i></p>	NT	JM (pers comms) confirmed that development of the battery works have not commenced during the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence
HAZARDS			
Fire Safety Study			
B2	B2. Prior to commencing construction of the battery energy storage system, the Applicant must prepare a Fire Safety Study for the development, to the satisfaction of FRNSW and the Planning Secretary. The study must: <ul style="list-style-type: none"> (a) be consistent with the: <ul style="list-style-type: none"> (i) Department's <i>Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline</i>; (ii) NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; and 	NT	JM (pers comms) confirmed that the Fire Safety Study is not relevant to this stage of the project. Construction of the battery energy storage system has not commenced during the audit period.
	(b) describe the final design of the battery energy storage system and verify that the final design is consistent with all findings and recommendations in the Preliminary Hazard Analysis dated 25 March 2021.	NT	See Schedule 2, Condition B2(a) above.
B3	The Applicant must implement the measures described in the Fire Safety Study approved by the Planning Secretary.	NT	See Schedule 2, Condition B2(a) above.
Storage and Handling of Dangerous Goods			
B4	The Applicant must store and handle all chemicals, fuels and oils used on-site in accordance with: <ul style="list-style-type: none"> (a) the requirements of all relevant Australian Standards; and 	C	A spill kit was available at the project construction site, see Plate 8 . A bunded diesel storage area was also available at the time of the site inspection as well as a chemical storage cabinet, see Plate 1 and Plate 2 .
	(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 (a) and (b) above, the most stringent requirement shall prevail to the extent of the inconsistency.	C	See Schedule 2, Condition B4(a) above.
Emergency Plan			
B5	Prior to commissioning the battery energy storage system, the Applicant must prepare a comprehensive Emergency Plan and detailed emergency procedures for the battery energy storage system in consultation with FRNSW and the NSW RFS.	NT	JM (pers comms) confirmed that commissioning of the battery energy storage system has not occurred during the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence
	(a) be consistent with the Department’s Hazardous Industry Planning Advisory Paper No. 1, ‘Emergency Planning’ and RFS’s Planning for Bushfire Protection 2019 (or equivalent);		
	(b) identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting;	NT	See Schedule 2, Condition B5 (a) above.
	(c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site;	NT	See Schedule 2, Condition B5 (a) above.
	(d) list works that should not be carried out during a total fire ban;	NT	See Schedule 2, Condition B5 (a) above.
	(e) include availability of fire suppression equipment, access, and water;	NT	See Schedule 2, Condition B5 (a) above.
	(f) include procedures for the storage and maintenance of any flammable materials;	NT	See Schedule 2, Condition B5 (a) above.
	(g) notification of the local RFS Fire Control Centre for any works that have the potential to ignite surrounding vegetation proposed to be carried out during a bushfire danger period to ensure whether conditions are appropriate	NT	See Schedule 2, Condition B5 (a) above.
	(h) 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;	NT	See Schedule 2, Condition B5 (a) above.
	(i) include location of hazards (physical, chemical, and electrical) that may impact on firefighting operations and procedures to manage identified hazards during firefighting operations;	NT	See Schedule 2, Condition B5 (a) above.
	(j) 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;	NT	See Schedule 2, Condition B5 (a) above.
	(k) include bushfire emergency management planning; and	NT	See Schedule 2, Condition B5 (a) above.
	(l) include details of the how RFS would be notified, and procedures that would be implemented, in the event that: (i) there is a fire on-site or in the vicinity of the site; (ii) there are any activities on site that would have the potential to ignite surrounding vegetation; or (iii) there are any proposed activities to be carried out during a bushfire danger period; and	NT	See Schedule 2, Condition B5 (a) above.
	(m) include details on how the battery storage facility and sub-systems can be safely isolated in an emergency.	NT	See Schedule 2, Condition B5 (a) above.
B6	The Applicant must implement the Emergency Plan for the duration of the development, provide a copy of the plan to the local Fire Control Centre and keep two copies of the plan on- site in a prominent	NT	See Schedule 2, Condition B5 (a) above.

Cond	Project Approval SSD 8889679	Status	Evidence
	position adjacent to the site entry point at all times.		
BIODIVERSITY			
Vegetation clearance			
B7	The Applicant must not clear any native vegetation or fauna habitat located outside the approved disturbance areas described in the EIS.	NT	JM (pers comms) confirmed that no clearing of native vegetation is required for Stage 1 (Decoupling Works) of the project. See Schedule 2, Condition B8 below.
Biodiversity Management Plan			
B8	<p>Prior to commencement of native vegetation clearance, unless otherwise agreed by the Secretary, the Applicant must prepare a Biodiversity Management Plan to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced biodiversity expert/s;</p>	NT	<p>Sighted AGL letter to DPE dated 12 August 2022. The letter requested consideration on Schedule 2, Condition B8 of SSD 8886979 and noted that the Biodiversity Management Plan is not required for project Stage 1 (Decoupling Works) as the clearing of native vegetation is not required for this stage. The letter also notes that should native clearing be required for future stages a Biodiversity Management Plan will be prepared and submitted to the Department for review and approval.</p> <p>Sighted DPE letter dated 23 August 2022 that approves the staging or project plans and notes the Biodiversity Management Plan is not required for Stage 1 as no clearing of native vegetation is required for that stage of the project.</p>
	(b) be prepared in consultation with the BCS;	NT	See Schedule 2, Condition B8 (a) above.
	(c) describe the short, medium and long-term measures to be undertaken to manage vegetation and fauna habitat on the site;	NT	See Schedule 2, Condition B8 (a) above.
	(d) describe measures to be implemented within the site to minimise:	NT	See Schedule 2, Condition B8 (a) above.
	(i) the amount of clearing, including investigation of design options to minimise disturbance of		

Cond	Project Approval SSD 8889679	Status	Evidence
	native vegetation for the battery energy storage system and decoupling works; (ii) impacts on fauna, including undertaking pre-clearance surveys and maximising the salvage of resources for habitat enhancement; (iii) impacts on threatened flora and fauna species or ecological communities within the development footprint and its surrounds; (iv) the spread of weeds and fungal pathogens; (v) the generation and dispersion of sediment to watercourses; and (vi) light spill from night works; and		
	(e) include a program to monitor, evaluate and report on the effectiveness of the measures.	NT	See Schedule 2, Condition B8 (a) above.
B9	The Applicant must implement the Biodiversity Management Plan approved by the Planning Secretary.	NT	See Schedule 2, Condition B8 (a) above.
Biodiversity Offsets			
B10	The Applicant must retire the biodiversity credits for Offset Stages 1, 2 and 3 as specified in Table 1 below, prior to commencing vegetation clearing in those stages. The retirement of credits must be carried out in accordance with the Biodiversity Offsets Scheme of the BC Act.	NT	JM (pers comms) confirmed that disturbance of areas requiring retirement of biodiversity offset credits had not occurred during the audit period.
B11	The Applicant may review and update the ecosystem and species credit requirements in Table 1 to reflect the final construction footprint and resulting extent and type of plant community types to be cleared. Amendments to the ecosystem and species credit requirements must be undertaken in consultation with BCS and approved by the Planning Secretary prior to the commencement of construction of the relevant offset stage.	NT	JM (pers comms) confirmed that AGL have not sought to review and update ecosystem credit requirements during the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence																																																																							
	<p>Table 1: Ecosystem Credit Requirements</p> <table border="1"> <thead> <tr> <th rowspan="2">Vegetation Community</th> <th colspan="5">Credits Required</th> </tr> <tr> <th>Stage 1</th> <th>Stage 2</th> <th>Stage 3</th> <th>Stage 4</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td colspan="6">Ecosystem credits</td> </tr> <tr> <td>Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - Moderate</td> <td>-</td> <td>-</td> <td>-</td> <td>38</td> <td>38</td> </tr> <tr> <td>1001: Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - Rehabilitation</td> <td>-</td> <td>-</td> <td>34</td> <td>152</td> <td>186</td> </tr> <tr> <td>1001: Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - Native Grassland</td> <td>-</td> <td>21</td> <td>0</td> <td>1</td> <td>22</td> </tr> <tr> <td>1731: Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley - Moderate-Good</td> <td>-</td> <td>8</td> <td>0</td> <td>10</td> <td>18</td> </tr> <tr> <td>1002: Bull Oak grassy woodland of the central Hunter Valley - Moderate-Good</td> <td>-</td> <td>37</td> <td>11</td> <td>34</td> <td>82</td> </tr> <tr> <td>1071: Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion - Moderate</td> <td>-</td> <td>1</td> <td>0</td> <td>6</td> <td>7</td> </tr> <tr> <td colspan="6">Species credits</td> </tr> <tr> <td>Southern myotis</td> <td>-</td> <td>44</td> <td>21</td> <td>131</td> <td>196</td> </tr> <tr> <td>Striped legless lizard</td> <td>1</td> <td>31</td> <td>27</td> <td>220</td> <td>279</td> </tr> </tbody> </table>	Vegetation Community	Credits Required					Stage 1	Stage 2	Stage 3	Stage 4	Total	Ecosystem credits						Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - Moderate	-	-	-	38	38	1001: Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - Rehabilitation	-	-	34	152	186	1001: Narrow-leaved Ironbark - Grey Box grassy woodland of the central and upper Hunter - Native Grassland	-	21	0	1	22	1731: Swamp Oak - Weeping Grass grassy riparian forest of the Hunter Valley - Moderate-Good	-	8	0	10	18	1002: Bull Oak grassy woodland of the central Hunter Valley - Moderate-Good	-	37	11	34	82	1071: Phragmites australis and Typha orientalis coastal freshwater wetlands of the Sydney Basin Bioregion - Moderate	-	1	0	6	7	Species credits						Southern myotis	-	44	21	131	196	Striped legless lizard	1	31	27	220	279		
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	<p>Notes:</p> <ul style="list-style-type: none"> To identify the surface disturbance areas associated with Offset Stages 1, 2, 3 and 4 in Table 1, refer to the Figure in Appendix 3. The credits in Table 1 were calculated in accordance with Biodiversity Assessment Methodology (BAM) (DPIE, 2020). The available credit retirement options for the development include purchase and retirement of open market available biodiversity credits, payment into the Biodiversity Conservation Fund or 	NT	Note only.																																																																							

Cond	Project Approval SSD 8889679	Status	Evidence
	<i>establishment of a Biodiversity Stewardship Site.</i>		
AMENITY			
Noise			
B12	<p>The Applicant must:</p> <p>(a) ensure that noise generated by any construction is managed in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version; and</p>	NC	<p>JM (pers comms) confirmed that construction works for the project are only completed during the standard work hours recommended within the <i>Interim Construction Noise Guideline</i>.</p> <p>Section 3.1 of the approved sub-plan Liddell Decoupling Works – Construction Noise Management Plan (NMP) dated 22 August 2022 (see Schedule 2, Condition C1) notes that project construction works for Stage 1 are not predicted to exceed standard hours, evening hours, or night-time noise management levels.</p> <p>Records were not available at the time of audit to confirm that monitoring described in Section 7 of the NMP had been completed to verify that project noise impacts against modelling predictions.</p> <p>It is recommended that AGL commission construction noise monitoring for the project, in accordance with Section 7 of the approved NMP.</p> <p>It is also recommended that noise generated by construction for the project is managed in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009), or its latest version and evidence is retained.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
	(b) take all reasonable and feasible steps to minimise noise from construction and operational activities.	NC	<p>JM (pers comms) confirmed that decoupling works are only completed during approved operation hours.</p> <p>JM (pers comms) confirmed that all plant and equipment for the project are maintained and operated in accordance with manufacturers specifications.</p> <p>No evidence was available at the time of the audit to confirm that reasonable and feasible steps to minimise noise from construction and operational activities have been implemented for the project.</p> <p>It is recommended that reasonable and feasible steps to minimise noise from construction and operational activities is implemented and evidence is retained.</p>
Hours of construction			
B13	All construction work at the premises must be conducted between 7 am and 6 pm Monday to Friday and between 8 am and 1 pm Saturdays and at no time on Sundays and public holidays, unless an out of hours protocol is included within an approved Construction Environment Management Plan or the Planning Secretary agrees otherwise.	C	<p>JM (pers comms) confirmed that construction work at the premises is conducted between the approved hours of Schedule 2, Condition B13.</p> <p>Sighted a copy of the PBE Site Management Plan, version B, dated October 2022. The Plan describes that decoupling works will be undertaken during standard construction hours defined as:</p> <ul style="list-style-type: none"> • 7:00am to 6:00pm Monday to Friday inclusive; • 8:00am to 1:00pm on Saturday; and • At no time on Sunday or Public Holidays. <p>A PBE sign in / sign out register template</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>was sighted for the project although no copies of completed sign in / sign out registers were available at the time of the audit.</p> <p>It is recommended that the sign in / sign out register is implemented on site and completed copies are retained.</p>
Exceptions to construction hours			
B14	<p>The following activities may be carried out outside the recommended construction hours:</p> <p>(a) construction that causes LAeq_(15minute) noise levels that are:</p> <p>(i) no more than 5 dB above Rating Background Level at any residence in accordance with the <i>Interim Construction Noise Guideline</i> (DECC, 2009); and</p> <p>(ii) no more than the Noise Management Levels specified in Table 3 of the <i>Interim Construction Noise Guideline</i> (DECC, 2009) at other sensitive land uses; or</p>	NT	JM (pers comms) confirmed that there have been no activities outside of approved construction hours.
	(b) Decoupling works required to be completed during station outages; or	NT	See Schedule 2, Condition B14 (a) above.
	(c) for the delivery of materials required by the police or other authorities for safety reasons; or	NT	See Schedule 2, Condition B14 (a) above.
	(d) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.	NT	See Schedule 2, Condition B14 (a) above.
Dust and air emissions			
B15	<p>The Applicant must take all reasonable and feasible steps to:</p> <p>(a) minimise odour, fume and dust emissions of the development;</p>	C	<p>No odour, fume or dust emissions were identified during the audit site inspection.</p> <p>The site inspection confirmed that speed limit signage is in place and engines and equipment are switched off when not in use.</p> <p>JM (pers comms) confirmed that no complaints have been received for the project in relation to odour, fume or dust emissions during the audit period.</p> <p>Sighted PBE Site Management Plan dated October 2022 which notes that where</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>possible all PBE workers, contractors and visitors will take reasonable steps to minimise odour, fume and dust emissions. The PBE Site Management Plan also lists odour, fume and dust emissions control measures for the project including provision of a water cart for dust suppression, regular visual inspections of work areas, any stockpile heights will have a maximum height designed to reduce potential wind mobilisation, speed restrictions and signage to be put in place, wash down facilities will be made available (Vacuum truck, water cart hose or similar) prior to vehicles leaving site under muddy conditions, all construction and maintenance equipment and vehicles are to be operated and maintained to the manufacturer's specifications, and be regularly serviced, engines & equipment to be switched off when not in use and Limit the quantity of chemical products stored on site to the extent practical.</p> <p>Viewed pre-start inspection records for a watercart used for the project by FCS, completed in April and May 2023.</p>
	(b) eliminate or minimise the risk of spontaneous combustion; and	C	<p>Sighted PBE Site Management Plan dated October 2022 which notes where possible all PBE workers, contractors & visitors shall take reasonable steps to eliminate or minimise the risk of spontaneous combustion.</p> <p>No odour, fume or dust emissions were identified during the audit site inspection.</p>
	(c) minimise to the greatest extent practicable, dust generating surfaces exposed on the site.	C	The site inspection confirmed that exposed

Cond	Project Approval SSD 8889679	Status	Evidence
			disturbance was minimised to those areas required for project construction activities.
Visual			
B16	The Applicant must: (a) minimise the off-site visual impacts of the development;	C	JM (pers comms) noted all work is completed during approved day time construction hours only. The site inspection confirmed that project works at the time of the audit are limited in scale, with minimal views available from public roads.
	(b) ensure the visual appearance of all ancillary infrastructure (including paint colours) blends in as far as possible with the surrounding landscape; and	C	The site inspection confirmed that the visual appearance of the project blends in as far as possible with the surrounding landscape, see Plate 4 .
	(c) not mount any advertising signs or logos on site, except where this is required for identification or safety purposes.	C	The site inspection confirmed that there has been no mounting of any advertising signs or logos on site, except where required for identification or safety purposes.
Lighting			
B17	The Applicant must: (a) minimise the off-site lighting impacts of the development; and	C	JM (pers comms) noted that all work is completed during approved day time construction hours. The site inspection confirmed that project works at the time of the audit are limited in scale, with minimal views available from public roads.
	(b) ensure that any external lighting associated with the development: <ul style="list-style-type: none"> is installed as low intensity lighting (except where required for safety or emergency purposes); does not shine above the horizontal; and 	NT	The audit site inspection confirmed that there is no external lighting associated with the project. See comments on Schedule 2, Condition B13.

Cond	Project Approval SSD 8889679	Status	Evidence
	<ul style="list-style-type: none"> complies with <i>Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting</i>, or its latest version. 		
HERITAGE			
Protection of Heritage Items			
B18	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items located outside the development footprint.	C	JM (pers comms) confirmed that known heritage sites are located outside of the development footprint will not be impacted as part of Stage 1 of the Project. The Liddell Power Station Decoupling Works Aboriginal Cultural Heritage Management Plan (ACHMP) dated 22 August 2022 describes the procedure for sites outside the development footprint. Section 3.7 notes that other known sites are a sufficient distance away from the ACHMP Area so as not to represent an impact risk and the construction footprint will be demarcated or communicated to contractors to ensure no disturbance outside of the approved area.
B19	<p>If any previous unknown Aboriginal object of Aboriginal place is discovered on the site, or suspected to be on the site:</p> <p>(a) all work in the immediate vicinity of the object or place must cease immediately;</p> <p>(b) a 10m buffer area around the object or place must be cordoned off; and</p> <p>(c) Heritage NSW must be contacted immediately.</p>	NT	<p>Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded Aboriginal objects or places have been identified within the ACHMP area.</p> <p>JM (pers comms) confirmed that no new heritage sites have been identified during project construction and that the AGL site induction covers unexpected finds procedures.</p>
B20	<p>Work in the immediate vicinity may only recommence if:</p> <p>(a) the potential Aboriginal object is confirmed by Heritage NSW, in consultation with the Registered Aboriginal Parties, not to be an Aboriginal object or Aboriginal place;</p>	NT	Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded

Cond	Project Approval SSD 8889679	Status	Evidence
	<p>(b) the Cultural Heritage Management Plan is revised to include the Aboriginal object and appropriate measures in respect of it; or</p> <p>(c) the Planning Secretary is satisfied with the measures to be implemented in respect of the Aboriginal object and makes a written direction in that regard.</p>		<p>Aboriginal objects or places have been identified within the ACHMP area.</p> <p>JM (pers comms) confirmed that sites identified in the EIS are not relevant to Stage 1 of the project.</p>
B21	The Applicant must ensure that all known Aboriginal objects or Aboriginal places on the site and within any offset areas are properly recorded, those records are kept up to date and are reported to the Aboriginal Heritage Information Management System (AHIMS).	NT	Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which notes that no previously recorded Aboriginal objects or places have been identified within the ACHMP area.
Cultural Heritage Management Plan			
B22	<p>B22. The Applicant must prepare an Aboriginal Cultural Heritage Management Plan for the development. The plan must</p> <p>(a) be prepared by suitably qualified and experienced persons approved by the Secretary;</p>	C	<p>Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022 which was prepared by AECOM Australia Pty Ltd.</p> <p>Sighted DPE letter dated 13 February 2023 endorsing Geordie Oakes (of AECOM) as a suitably qualified and experienced person to prepare the project ACHMP under Condition B22 of SSD 8889679.</p>
	(b) be prepared in consultation with Registered Aboriginal Parties and Heritage NSW;	C	<p>Sighted DPE letter dated 31 August 2022 which notes the ACHMP has been prepared in consultation with RAPs and Heritage NSW.</p> <p>NSW and Registered Aboriginal Parties and contains the information required by the conditions of approval.</p>
	(c) be submitted to the Planning Secretary for approval prior to carrying out construction under this consent;	C	Sighted AGL notification of commencement letter dated 12 August 2022 which notes pre-construction activities and physical works are scheduled to commence on the Stage 1 Decoupling Works on 1 September 2022.

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>The letter also notes that the ACHMP was lodged on the 8 July 2022.</p> <p>DPE approved the ACHMP via letter dated 31 August 2022.</p>
	<p>(d) describe the measures to be implemented on the site to:</p> <ul style="list-style-type: none"> (i) comply with the heritage-related operating conditions of this consent; (ii) ensure all workers receive suitable Aboriginal cultural heritage inductions prior to carrying out any activities which may cause impacts to Aboriginal objects or Aboriginal places, and that suitable records are kept of these inductions; (iii) protect, monitor and/or manage identified Aboriginal objects and Aboriginal places (including investigation of design options to avoid disturbance of Aboriginal objects) in accordance with the commitments made in the document/s listed in condition A2(c); (iv) protect Aboriginal objects and Aboriginal places located outside the approved disturbance area from impacts of the development; (v) manage the discovery of suspected human remains and any new Aboriginal objects or Aboriginal places, including provisions for burials, over the life of the development; (vi) maintain and manage reasonable access for relevant Aboriginal stakeholders to Aboriginal objects and Aboriginal places (outside of the approved disturbance area); and (vii) facilitate ongoing consultation and involvement of Registered Aboriginal Parties in the conservation and management of Aboriginal cultural heritage on the site; and (viii) include a strategy for the care, control and storage of Aboriginal objects salvaged on the site, both during the life of the development and in the long term. 	C	<ul style="list-style-type: none"> (i) Sighted Liddell Power Station Decoupling Works ACHMP dated 22 August 2022. (ii) Section 8 of the ACHMP describes training and inductions. Section 8 notes general Aboriginal cultural heritage management training is provided to all AGL employees and contractors through the site induction process at Liddell Power Station. Employees and contractors will also be made aware of their legal responsibilities under the <i>NP&W Act 1974</i>. (iii) Section 3 of the ACHMP describes Management of Aboriginal Cultural Heritage Values. (iv) Section 3.7 describes management of sites outside the Development Footprint. (v) Section 3.3 of the ACHMP describes Unanticipated Finds Protocol including Aboriginal Objects/Places and Human Skeletal Remains. (vi) Section 3.6 of the ACHMP describes Care and Control of Salvaged Objects. Section 3.6 notes Aboriginal community members may wish to access sites

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>for appropriate cultural purposes (e.g. education and ceremony). AGL will facilitate reasonable access upon request and reasonable access will be subject to Bayswater Power Station's operational requirements.</p> <p>(vii) Section 4.5 of the ACHMP describes ongoing RAP consultation.</p> <p>(viii) Section 3.6 of the ACHMP describes Care and Control of Salvaged Objects. Section 3.6 notes a long-term management strategy has not yet been established by Liddell Power Station or the RAPs. As such, salvaged Aboriginal objects will remain in the temporary storage location until a decision is made. Any decisions regarding the long-term management of Aboriginal objects will be made in consultation with RAPs and Heritage NSW. A long-term management strategy will be prepared prior to power station closure.</p>
B23	The Applicant must implement the Aboriginal Cultural Heritage Management Plan approved by the Planning Secretary.	C	See comments in Schedule 2, Condition B22 above.
SOIL AND WATER			
Water Supply			
B24	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.	C	Sighted Liddell Decoupling Works Soil and Water Management Plan dated 22 August

Cond	Project Approval SSD 8889679	Status	Evidence
	<p>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.</p>		<p>2022.</p> <p>Section 3.2.5 of the Soil and Water Management Plan describes Water Supply and AGL Hunter River Water Allocations, which are sufficient to meet the demand for the Stage 1 construction works during the audit period.</p>
Water Pollution			
B25	<p>The Applicant must ensure that all surface discharges from the development comply with all relevant provisions of the POEO Act, including any discharge limits (both volume and quality) set for the development in any EPL.</p>	C	<p>JM and KS (pers comms) confirmed any sediment water from the construction area is captured in the existing Liddell site water management system.</p> <p>The site inspection confirmed that sediment fences are in place at the project site, see Plate 5 and Plate 10.</p> <p>The site inspection also noted that all chemicals for the project are contained and stored in appropriate bunding, see Plate 2.</p>
Operating Conditions			
B26	<p>The Applicant must:</p> <p>(a) ensure the development is designed, constructed and maintained to minimise impacts on surface water, flooding and groundwater at the site;</p>	C	<p>JM and KS (pers comms) confirmed any sediment water from the construction area is captured in the existing Liddell site water management system.</p> <p>Sighted Liddell Decoupling Works Soil and Water Management Plan dated 22 August 2022.</p> <p>Section 3.2.4 of the Soil and Water Management Plan notes that the Project is not located on land that is mapped under the Singleton LEP as being susceptible to flooding. No mapping for flood prone land is available under the Muswellbrook LEP.</p> <p>The Battery and Decoupling footprints are</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>elevated above the maximum water level of Lake Liddell and away from drainage lines.</p> <p>Section 4.2.2 of the Soil and Water Management Plan notes indirect impacts to the groundwater environment during construction may occur because of potential spills or leaks of hazardous materials occurring during construction and migrating to the water table. Potential spills or leaks may include oils, lubricants and fuels used by construction plant.</p> <p>The site inspection confirmed that sediment and erosion controls are in place for the project offices and construction areas, see Plate 5 and Plate 10.</p> <p>All chemicals used for the project were stored in bunding at the time of the site inspection, see Plate 2.</p> <p>A spill kit was available on site at the time of the site inspection, see Plate 4.</p>
	(b) minimise any soil erosion associated with the construction, upgrading or decommissioning of the development in accordance with the relevant requirements in the <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) manual, or its latest version;	C	The site inspection confirmed that sediment and erosion control measures have been implemented and are being maintained for the project, see Plate 5 and Plate 10 .
	(c) ensure the battery energy storage system and ancillary infrastructure are designed, constructed and maintained to avoid causing any erosion on site; and	NT	JM (pers comms) confirmed that development of the battery energy storage system and ancillary infrastructure has not commenced at the time of audit.
	(d) ensure all works are undertaken in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (NRAR, 2018), or its latest version unless DPE Water agrees otherwise.	NT	See Schedule 2, Condition B26 (c) above.
WASTE			

Cond	Project Approval SSD 8889679	Status	Evidence
B27	<p>The Applicant must:</p> <p>(a) take all reasonable steps to minimise the waste generated by the development;</p>	C	<p>Sighted the Liddell Decoupling Works Waste Management Plan dated 22 August 2022. The Waste Management Plan identifies the key waste issues that require control to manage project waste impacts. Section 3.3 of the Waste Management Plan notes materials with minimal packaging requirements should be used, removal of packaging should occur offsite by suppliers, and fabrication of parts should be conducted offsite.</p> <p>The site inspection confirmed that waste is being segregated into separate skip bins (see Plate 6). Viewed examples of March 2023 receipts to AGL from the Muswellbrook Waste and Recycling Facility, confirming the receipt of project waste.</p> <p>It is recommended that AGL retains copies of records from the project waste contractor.</p>
	<p>(b) classify all waste in accordance with the <i>Waste Classification Guidelines</i> (EPA, 2014);</p>	C	<p>KS (pers comms) confirmed that waste is required to be managed in accordance with the Waste Management Plan.</p> <p>No evidence was available at the time of the audit to determine that waste materials generated by the project are recorded, classified and monitored against the EPA Waste Classification Guidelines.</p> <p>It is recommended that AGL ensure project waste is recorded and classified generally in accordance with the EPA Waste Classification Guidelines.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
	(c) dispose of all waste at appropriately licensed waste facilities or as expressly permitted in an applicable EPL; and	C	<p>JM (pers comms) confirmed that project waste is disposed of appropriately at a licenced waste facility.</p> <p>The site inspection confirmed that waste is being segregated into separate skip bins (see Plate 6). Viewed examples of March 2023 receipts to AGL from the Muswellbrook Waste and Recycling Facility, confirming the receipt of project waste.</p> <p>It is recommended that AGL retains copies of records from the project waste contractor.</p>
	(d) manage any asbestos or asbestos-contaminated materials identified during construction and operation of the development in accordance with the requirements under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> .	NT	<p>KS (pers comms) confirmed that there has been no unexpected asbestos identified during the audit period.</p> <p>Viewed a copy of the AGL Asbestos Management Procedure, AGLM-HSE-PRO-007.10.01 which outlines responsibilities, procedures/ protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos.</p>
DECOMMISSIONING AND REHABILITATION			
B28	The Applicant must rehabilitate the development to the satisfaction of the Planning Secretary. The rehabilitation must comply with the objectives in Table 2.	NT	JM (pers comms) confirmed that no rehabilitation has been undertaken during the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence						
	<p><i>Table 2: Rehabilitation Objectives</i></p> <table border="1"> <thead> <tr> <th>Features</th> <th>Objectives</th> </tr> </thead> <tbody> <tr> <td>All areas of the site affected by the development^a</td> <td> <ul style="list-style-type: none"> → Safe, stable and non-polluting^f → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise^f → Minimise the visual impact of any above-ground ancillary infrastructure agreed to be retained for an alternative use^a </td> </tr> <tr> <td>Community^a</td> <td> <ul style="list-style-type: none"> → Ensure public safety at all times^a </td> </tr> </tbody> </table>	Features	Objectives	All areas of the site affected by the development ^a	<ul style="list-style-type: none"> → Safe, stable and non-polluting^f → All infrastructure to be decommissioned and removed, unless the Planning Secretary agrees otherwise^f → Minimise the visual impact of any above-ground ancillary infrastructure agreed to be retained for an alternative use^a 	Community ^a	<ul style="list-style-type: none"> → Ensure public safety at all times^a 		
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SCHEDULE 2: PART C – ENVIRONMENTAL MANAGEMENT AND REPORTING									
ENVIRONMENTAL MANAGEMENT									
Environmental Management Strategy									
C1	Prior to commencing construction, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:	C	Sighted AGL Liddell Environmental Management Strategy (EMS) dated 22 August 2022 which provides the strategic framework of the Project. DPE approved the project EMS and sub-plans via letter dated 31 August 2022.						
	(a) provide the strategic framework for environmental management of the development;	C	Section 3 of the EMS describes the Statutory Requirements that apply to the development.						
	(b) identify the statutory approvals that apply to the development;	C	Section 7.3 of the EMS outlines proposed key roles and responsibilities for both AGLM, contractors and sub-contractors working on all stages of the project.						
	(c) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	C							
	(d) describe the procedures that would be implemented to:	NC	(i) Section 6.2 of the EMS describes Stakeholder Consultation. AGLM maintains a community reference group known as the AGL Community Dialogue Group which meets quarterly. Sighted Community Dialogue Group meeting minutes dated 23 June						
	(i) keep the local community and relevant agencies informed about the operation and environmental performance of the development;								
	(ii) receive, handle, respond to, and record complaints;								
	(iii) resolve any disputes that may arise;								
	(iv) respond to any non-compliance;								
	(v) respond to emergencies; and								

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>2022 and 3 March 2022.</p> <p>(ii) Section 6.3 of the EMS describes Complaint and Enquiry Management. The EMS notes that complaints will be recorded in the Community Complaints Register AGLM-HSE-REG-008.09.2. JM (pers comms) confirmed no issues have been raised by regulatory agencies or the local community during audit period. A current copy of the complaints register was not available on the AGL website at the time of the audit. It is recommended that the project complaints register is regularly updated and made available on the AGL website.</p> <p>(iii) Section 6.3 of the EMS describes dispute management.</p> <p>(iv) Section 7.7 of the EMS describes compliance management. Section 7.7.1 notes that Environmental incidents and hazards (non-conformances and non-compliances) shall be entered into myHSE and managed in accordance with the Incident, Near Miss and Hazard Management Procedure AGL-HSE-PRO-012.1. Evidence that non-compliances are being entered into myHSE was not available at the time of the audit. It is recommended that</p>

Cond	Project Approval SSD 8889679	Status	Evidence
			<p>AGL enter any non-compliances into myHSE and records are retained.</p> <p>(v) Section 7.5 of the EMS describes Incident and emergency management. Section 7.5.2 notes each Contractor strategy or management plan will detail an emergency response plan that will deal with the management of incidents that constitute an emergency.</p>
	<p>(e) include:</p> <p>(i) the following subplans:</p> <ul style="list-style-type: none"> • soil, stormwater, water quality, flood and spoil management; • construction and decommissioning noise, including an out-of-hours works protocol; • air quality management; • contamination, including an unexpected finds protocol • waste management; and • traffic. <p>(ii) references to any strategies, plans and programs approved under the conditions of this approval; and</p> <p>(iii) a clear plan depicting monitoring to be carried out under the conditions of this approval.</p>	C	<p>(i) Sighted Liddell Decoupling Works EMS sub-plans dated 22 August 2022, including:</p> <ul style="list-style-type: none"> - Soil and Water Management Plan; - Construction Noise Management Plan, which includes an out of hours work protocol; - Air Quality Management Plan; - Contamination Management Plan, which includes an accidental discovery protocol for unexpected finds; - Waste Management Plan; and - Traffic Management Plan. <p>(ii) Planned Strategies, Plans and Programs for the approval of DPE are listed in Section 1.2, Table 1 of the EMS.</p> <p>(iii) Appendix B of the EMS provides a plan depicting monitoring to be carried out under the conditions of this approval.</p>

Cond	Project Approval SSD 8889679	Status	Evidence
C2	Applicant must implement the Environmental Management Strategy approved by the Planning Secretary.	C	See Schedule 2, Condition C1 above.
Revision of Strategies, Plans and Programs			
C3	Within 3 months, unless the Planning Secretary agrees otherwise, of:	NT	JM (pers comms) confirmed there have been no submissions of incident reports in relation to the project.
	(a) the submission of an incident report under condition C4 below;		
	(b) the submission of an audit report under condition C13 below; and	NT	JM (pers comms) confirmed there have been no previous audit reports required under Schedule 2, Condition C13.
	(c) the approval of any modification to the conditions of this consent; or	NT	No modifications to SSD 8889679 have been approved by DPE.
	(d) a direction of the Secretary under condition A3 of Schedule 2; the Applicant must review and, if necessary, revise the studies, strategies or plans required under the conditions of consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted to the Secretary for approval, unless otherwise agreed with the Secretary.	NT	JM (pers comm) confirmed there have been no written directions made by the Secretary regarding project plans, strategies and programs.
	<i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i>	NT	Note only.
COMPLIANCE			
Incident Notification, Reporting and Response			
C4	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.	NT	JM (pers comms) confirmed no notifiable incidents have been identified in relation to the project during the audit period.
Non-Compliance Notification			
C5	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	C	JM (pers comms) confirmed no non-compliances were identified by AGL during the audit period.

Cond	Project Approval SSD 8889679	Status	Evidence
			It is recommended that AGL notify DPE of the non-compliances identified in this audit report within seven days of the document date.
C6	A non-compliance notification must identify the development and the application number for it, set out the condition of approval that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	NT	See Schedule C5 above.
C7	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	NT	See Schedule 2, Conditions C4 and C5 above.
Compliance Reporting			
C8	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020).	NT	A 52-week period has not elapsed from the date of commencement and as such, the requirement for a project Compliance Report has not been triggered.
C9	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed to by the Planning Secretary.	NT	See Schedule 2, Condition C8 above.
C10	The Applicant must make each Compliance Report publicly available within 60 days of submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	NT	See Schedule 2, Condition C8 above.
C11	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	NT	See Schedule 2, Condition C8 above.
NOTIFICATIONS			
Notification of Department			
C12	Prior to commencing the 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	C	Sighted AGL notification of commencement letter to DPE dated 12 August 2022 which notes pre-construction activities and physical works are scheduled to commence on the Stage 1 Decoupling

Cond	Project Approval SSD 8889679	Status	Evidence
	that would be carried out during the relevant stage.		Works on 1 September 2022.
INDEPENDENT ENVIRONMENTAL AUDIT			
C13	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020, or its latest version).	C	This IEA (see Appendix A)
C14	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	NC	Sighted DPE endorsement letter dated 13 March 2023 approving the appointment of James Bailey & Associates to prepare the IEA for the Liddell Battery and Bayswater Ancillary Works. Written approval from DPE for JBA to complete the audit occurred after commencement of this IEA. It is recommended that AGL obtains an endorsement letter from the DPE prior to next audit.
C15	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020, or its latest version), upon giving at least 4 weeks' notice (or timing) to the Applicant of the date upon which the audit must be commenced.	NT	Noted.
C16	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020, or its latest version), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C13 of this approval, or condition C15 where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	NT	a) AGL to review and respond to this IEA. b) AGL to respond to this IEA. c) AGL to make this IEA and response publicly available.
C17	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection, as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	NC	IEA report and AGL response has exceeded the two-month requirement for submission to the Planning Secretary. It is recommended that AGL submit this IEA report and their response to DPE as soon as possible following completion of

Cond	Project Approval SSD 8889679	Status	Evidence
			this audit report.
C18	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020, or its latest version), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	NT	There have been no requests made by AGL to cease ongoing independent operational audit requirements.
ACCESS TO INFORMATION			
C19	<p>The Applicant must:</p> <p>(a) make the following information publicly available on its website as relevant to the stage of the development:</p> <ul style="list-style-type: none"> (i) the EIS; (ii) the final layout plans for the development; (iii) current statutory approvals for the development; (iv) approved strategies, plans or programs required under the conditions of this consent; (v) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; (vi) how complaints about the development can be made; (vii) a complaints register; (viii) any independent environmental audit, and the Applicant's response to the recommendations in any audit; and (ix) any other matter required by the Planning Secretary; and 	NC	<ul style="list-style-type: none"> (i) The EIS is publicly available on the AGL website. (ii) Development Consent SSD 8889679 is available on the AGL website. (iii) Development Consent SSD 8889679 is available on the AGL website. (iv) The ACHMP, EMS and EMS sub-plans (see Schedule 2, Condition C1) are publicly available on the AGL website. (v) Stage 1 and Stage 2 of the project are outlined on the AGL website. (vi) Complaints and Enquiries hotline number, email address and postal address are available on the website. (vii) A current complaints register was not able to be accessed on the AGL website at the time of the audit. It is recommended that the project complaints register is regularly updated and made available on the AGL website. (viii) Nil previous IEAs.

Cond	Project Approval SSD 8889679	Status	Evidence
			(ix) Nil other matters required by the Planning Secretary. It is recommended that all information and documents (as they are obtained, approved or as otherwise stipulated within the conditions of this consent) noted in Schedule 2, Condition C19 are made publicly available on the AGL website.
	(b) keep this information up to date.	NC	See Schedule 2, Condition C19(a) above.
SCHEDULE 2: PART D – CONDITIONS EXTRACTED FROM CONSENTS REFERRED TO IN CONDITION A5			
	<i>Note: For the avoidance of doubt, a consent listed in condition A5 will be surrendered and cease to operate from the date on which a valid notice is served on the consent authority pursuant to cl 97 of the EP&A Regulation. The conditions listed in this Part D are drawn from the consents listed in condition A5 but form part of this consent from the date of this consent.</i>	NT	Note only.
CONDITIONS FROM DA 8.2018.273.2 - LOW PRESSURE PUMP STATION STABILISATION (SINGLETON COUNCIL)			
D1	The development of the Low Pressure Pump Station Stabilisation is to be undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the following document:	NC	No evidence was available at the time of the audit to confirm the development of the Low Pressure Pump Station Stabilisation was undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the GHD <i>Bayswater Low Pressure Pump Stabilisation Biodiversity Development Assessment Report</i> . It is recommended that AGL retains evidence to confirm that the development of the Low Pressure Pump Station Stabilisation was undertaken in accordance with the mitigation and management measures contained within Table 5-1 of the GHD Bayswater Low

Cond	Project Approval SSD 8889679	Status	Evidence						
			Pressure Pump Stabilisation Biodiversity Development Assessment Report prior to surrender of the DA 8.2018.273.2 under Schedule 2, Condition A5 of SSD 8889679.						
	<table border="1"> <thead> <tr> <th data-bbox="280 427 627 467">Title</th> <th data-bbox="627 427 864 467">Written-By</th> <th data-bbox="864 427 1296 467">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="280 467 627 592">Bayswater Low-Pressure Pump Stabilisation Biodiversity Development Assessment Report</td> <td data-bbox="627 467 864 592">GHD</td> <td data-bbox="864 467 1296 592">December 2018</td> </tr> </tbody> </table>	Title	Written-By	Date	Bayswater Low-Pressure Pump Stabilisation Biodiversity Development Assessment Report	GHD	December 2018		
Title	Written-By	Date							
Bayswater Low-Pressure Pump Stabilisation Biodiversity Development Assessment Report	GHD	December 2018							
D2	Site Contamination Issued During Construction - Should any new information come to light during demolition or construction works which has the potential to alter previous conclusions about site contamination, the Planning Secretary must be immediately notified by the applicant, and works must cease. Works must not recommence on site until approval is granted by the Planning Secretary.	NT	JM (pers comms) confirmed that there has been no new information come to light during demolition or construction works which has the potential to alter previous conclusions about site contamination.						
CONDITIONS FROM DA 20_98 - DEVELOPMENT OF RAVENSWORTH COAL UNLOADER FACILITY (SINGLETON COUNCIL)									
D3	The development of the Ravensworth Coal Unloader Facility must be carried out in accordance with the following document:	NC	<p>No evidence was available at the time of the audit to confirm the development of the Ravensworth Coal Unloader Facility was carried out in accordance with HLA Envirosciences <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i>.</p> <p>It is recommended that AGL retains evidence that confirms that the development of the Ravensworth Coal Unloader Facility has been carried out in accordance with the HLA Envirosciences <i>Proposed Macquarie Generation Rail Project at Ravensworth Environmental Impact Statement</i> prior to surrender of the DA 20_98 under Schedule 2,</p>						

Cond	Project Approval SSD 8889679	Status	Evidence						
			Condition A5 of SSD 8889679.						
	<table border="1"> <thead> <tr> <th>Title</th> <th>Written-By</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td><i>Proposed Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</i></td> <td>HLA-<i>Envirosciences</i></td> <td>December-1997</td> </tr> </tbody> </table>	Title	Written-By	Date	<i>Proposed Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</i>	HLA- <i>Envirosciences</i>	December-1997		
Title	Written-By	Date							
<i>Proposed Macquarie-Generation-Rail-Project-at-Ravensworth-Environmental-Impact-Statement</i>	HLA- <i>Envirosciences</i>	December-1997							
D4	The applicant is to liaise with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line.	NC	<p>No evidence was available at the time of the audit to confirm AGL has liaised with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line.</p> <p>It is recommended that AGL retain evidence that confirms consultation with Rail Access Corporation to develop and implement operational protocols and train working procedures to expedite push-pull trains onto and off the Main Northern Line prior to surrender of the DA 20_98 under Schedule 2, Condition A5 of SSD 8889679.</p>						
BIODIVERSITY CONSERVATION DIVISION									
D5	<p>(a) The applicant is to prepare and implement a site Environmental Management Plan for the Ravensworth Coal Unloader Facility relating to:</p> <ul style="list-style-type: none"> (i) Locations and designs for clean and contaminated water pathways, with detailed design drawings for all sediment basins. (ii) Segregated pathways and storage facilities for clean and contaminated stormwater runoff, with segregated reuse priority for contaminated water. (iii) A commitment not to allow any excess contaminated runoff to enter Bowmans Creek, and a suitable monitoring programme to demonstrate that no excess contaminated water leaves the site. 	C	Viewed the Aurizon 'Antiene and Newdell: Operational Environmental Management Plan' dated 18 October 2022. The document identifies controls and maintenance requirements for the management of the AGLM Newdell coal unloading facility by Aurizon (the previous Ravensworth Coal Unloader Facility).						

Cond	Project Approval SSD 8889679	Status	Evidence						
	<ul style="list-style-type: none"> (iv) A maintenance schedule for the pollution traps identifying cleaning periods and methods of disposal. (v) A maintenance schedule for the sediment ponds identifying cleansing periods and methods of disposal. (b) The applicant is to demonstrate a commitment to maintaining final drainage lines in a stable condition. 								
CONDITIONS FROM DA 401_2000 - COAL/RAIL UNLOADER AUGMENTATION (SINGLETON COUNCIL)									
D6	APPROVAL IN ACCORDANCE WITH PLANS - The development of the Coal/Rail Unloader Augmentation must be carried out generally in accordance with the development application and accompanying plans described as described in the following document:	NC	<p>No evidence was available at the time of the audit to confirm the development of the Coal/Rail Unloader Augmentation is carried out generally in accordance with DA 401_2000 and accompanying Statement of Environmental Effects.</p> <p>It is recommended that AGL retain evidence that confirms the development of the Coal/Rail Unloader Augmentation is carried out generally in accordance with the development application and accompanying plans prior to surrender of the DA 401_2000 under Schedule 2, Condition A5 of SSD 8889679.</p>						
	<table border="1"> <thead> <tr> <th>Title</th> <th>Written-By</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation</td> <td>HLA – Envirosciences</td> <td>August 2000</td> </tr> </tbody> </table>	Title	Written-By	Date	Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation	HLA – Envirosciences	August 2000		
Title	Written-By	Date							
Statement of Environmental Effects – Proposed Ravensworth Rail Unloader Augmentation	HLA – Envirosciences	August 2000							

Cond	Project Approval SSD 8889679	Status	Evidence
APPENDIX 4 – INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS			
WRITTEN INCIDENT NOTIFICATION REQUIREMENTS			
B1	A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 7 of Schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred.	NT	JM (pers comms) confirmed there no notifiable incidents related to the project occurred during the audit period.
B2	Written notification of an incident must: (a) identify the development and application number; (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) identify how the incident was detected; (d) identify when the applicant became aware of the incident; (e) identify any actual or potential non-compliance with conditions of consent; (f) describe what immediate steps were taken in relation to the incident; (g) identify further action(s) that will be taken in relation to the incident; and (h) identify a project contact for further communication regarding the incident.	NT	See comment in Appendix 4, Condition B1.
B3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	NT	See comment in Appendix 4, Condition B1.
B4	The Incident Report must include: (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders regarding the incident.	NT	See comment in Appendix 4, Condition B1.

Table C2 RTS Updated Mitigation Measures (Jacobs, 2021)

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
Hazard and risk				
HR1	<p>During detailed design for the Project:</p> <ul style="list-style-type: none"> • A detailed bushfire threat assessment will be conducted for the Project, including establishment of an APZ, in consultation with the RFS • The separation distance between infrastructure within the Battery will be determined in accordance with applicable Codes and Standards and manufacturer's recommendations so that the preferred strategy of allowing a fire in one Battery enclosure or inverter to burn without the risk of propagating to other infrastructure can be maintained without the need for external firefighting • The separation distance within the Battery will be determined in accordance with applicable Codes and Standards and manufacturer's recommendations to allow safe escape in case of a fire • The need for active firefighting requirements at the Battery will be determined in consultation with RFS, FRNSW and the DPIE. Detailed fire fighting response and any need for fire water containment will be assessed and reported (e.g. in the format of a Fire Safety Study) post development approval, for review by DPIE, Fire rescue NSW and the RFS. The FSS will be developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Study Guidelines (HIPAP No. 2) • The health and safety associated with EMF on the site and the potential exposure to EMF will be considered for AGLM staff and contractors as part of AGLM's obligations for their health and wellbeing under the Work Health and Safety Regulations 2011 (NSW) • Measures to prevent a leak occurring from the brine pipeline, the emergency diesel generators and at the Battery, and for secondary containment should a leak occur, will be included as part of the detailed design of the Project. The likelihood of a significant loss of containment event associated with this Project (Level 4) will be designed to Rare in accordance with AGL's Risk Management and Assessment Standard • The PHA be progressed to a FHA once the design of the development has been finalised. Commitments identified in the PHA will be integrated into the management for the Project. • The register of commitments (Appendix 1 of the PHA (Planager Pty Ltd, 2021)) will be integrated into the management for the Project. This includes integration of 84 individual commitments, including for the design, installation and maintenance of the Battery 	Detailed design	NT	<p>Sighted AGL letter to DPE dated 12 August 2022 which notes that a Fire Safety Study is not required for Stage 1 of the project (Decoupling Works) and that a Fire Safety Study will be undertaken prior to commencing construction of the battery energy storage system.</p> <p>JM (pers comms) confirmed that the battery and brine pipeline works have not commenced during the audit period.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	automatic shutdown system on exceedance of safe limits; installation of deflagration venting and fire protection inside the Battery enclosures; design of the brine pipeline, waste oil facility, emergency diesel generators and the Battery such that the risk of pollution from a release is reduced to ALARP; installation of protective barriers, including at the transformers; and application of a rigorous and formal management of change process for the Project, including detailed hazard identification and risk assessment processes.			
HR2	Design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels	Detailed design	NC	<p>No evidence was available at the time of the audit that confirms design and selection of all electrical equipment is to minimise EMF levels and comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels.</p> <p>It is recommended that AGL documents the design and selection process to ensure all electrical equipment considers EMF levels and complies with International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels.</p>
HR3	Risks associated with the Project will be managed through a Management of Change process. AGLM implements an Asset Change Management Standard, and any major change (defined as a change that has major implications to the strength, stability, operation and design of the asset and/or health and safety of employees) must undergo a detailed risk assessment using the AGL Risk Management and Assessment Standard to assess the risks that may be introduced by the proposed change. This will be undertaken for all Project components and appropriate controls implemented to reduce the risk to an acceptable level.	Prior to construction	NC	A copy of the AGL Management of Change Standard was sighted, version 1.2, dated 27 April 2021, however evidence that a Management of Change Process was completed for the project

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>was not available at the time of audit. It is recommended that a Management of Change process is completed for the project, in accordance with the relevant AGL Standard.</p>
HR4	<p>Storage and management of dangerous goods and hazardous materials (if required) will occur in a safe, secure location consistent with the requirements of applicable Australian Standards.</p>	<p>Construction / operation</p>	<p>C</p>	<p>No evidence of large volumes of dangerous goods or hazardous chemicals was observed during the audit site inspection.</p> <p>During the site inspection all chemicals on site were stored in adequate bunding, see Plate 1 and Plate 2.</p>
HR5	<p>Refuelling will take place in a designated area within the works area, away from ignition sources and trees or vegetation and with appropriate controls to prevent any spills coming into contact with the ground.</p>	<p>Construction / operation</p>	<p>C</p>	<p>JM (pers comms) confirmed that all contractor vehicles are taken off site for refuelling.</p> <p>Sighted the PBE (project contractor) Site Management Plan dated October 2022 which notes all fuelling maintenance and servicing of vehicles will be done away from any environmentally sensitive area. If refuelling cannot be done away from site, consideration should be given to the location (i.e., away from a water course)</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>and spill kits must be readily available.</p> <p>The site inspection confirmed that spill kits are available in construction areas, see Plate 8.</p>
HR6	<p>Appropriately stocked emergency spill kits will be available at all work areas at all times. All staff will be made aware of the location of the spill kit and trained in its use.</p>	Construction / operation	NC	<p>The site inspection confirmed that a spill kit is available on site, see Plate 8. No evidence was available at the time of the audit to confirm that all staff have been trained in its use.</p> <p>It is recommended that all project staff will be made aware of the location of the spill kit and trained in its use, with training records retained.</p>
HR7	<p>Temporary construction compounds will be maintained in a tidy and orderly manner to minimise potential fuel loads in the event that any construction compounds are affected by fire.</p>	Construction	C	<p>The audit site inspection confirmed that project construction areas are being maintained in a tidy and orderly manner, see Plate 4 and Plate 6.</p>
HR8	<p>Construction activities involving flammable materials and ignition sources (for example, welding) will be proactively managed to ensure that the potential for fire is effectively minimised. High risk construction activities, such as welding and metal work, would be subject to a risk assessment on total fire ban days and restricted or ceased as appropriate. Construction personnel will be inducted into the requirement to safely dispose of cigarette butts.</p>	Construction	C	<p>JM and KS (pers comms) confirmed that no hot works have been completed for the project to date and that designated smoking areas are available on site.</p> <p>JM (pers comms) confirmed</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>that AGL have a hot work procedure and a hot work checklist that is to be completed prior to any hot work on site.</p> <p>Sighted AGLM Hot Work Checklist AGLM-HSE-FRM-007.04.01 and AGL Hot Work Procedure AGLM-HSE-PRO-007.04. The Hot Work Procedure describes the systems and equipment required to be used where personnel must perform hot work tasks, including the identification and assessment of risks and the type of controls that must be in place to ensure that the work is conducted safely.</p> <p>Sighted PBE Hot Work Permit template Document No. 62090-20 which is to be completed prior to all tasks involving Hot Work.</p>
HR9	An emergency response plan for the Battery would be prepared for the Project and provided to the Local Emergency Management Committee.	Construction / operation	NT	JM (pers comms) confirmed that this is not relevant to the current stage of the project.
Air Quality				
AQ1	<p>The following will be undertaken to manage fugitive emissions from stored chemicals:</p> <ul style="list-style-type: none"> Limiting the quantity of chemical products stored at the site to the extent practical 	Construction / operation	C	Sighted Liddell Decoupling Works Air Quality Management Plan (AQMP) dated 22 August 2022 which

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	<ul style="list-style-type: none"> Ensure that all storage tanks are fitted with the appropriate controls in-line with the Protection of the Environment Operations (Clean Air) Regulation 2010. 			<p>describes control measures for fugitive emissions from stored chemicals as limiting the quantity of chemical products stored at the site to the extent practical and ensuring that all storage tanks are fitted with the appropriate controls in-line with the Protection of the Environment Operations (Clean Air) Regulation 2010.</p> <p>The audit site inspection confirmed that there were limited volumes of chemical products stored at the project construction area.</p>
AQ2	<p>During loading and unloading of materials, the following will be undertaken:</p> <ul style="list-style-type: none"> Water sprays as applicable Minimising drop heights Reviewing and where necessary modifying or suspending activities during dry and windy weather and elevated background air quality conditions. 	Construction	NC	<p>JM (pers comms) confirmed that regular visual inspection of work areas are completed to determine if additional dust suppression controls are required.</p> <p>Section 4 of the AQMP outlines controls to minimise dust emissions during project construction work.</p> <p>Evidence was not available at the time of the audit to confirm dust mitigation controls are implemented during the loading and unloading of materials.</p> <p>It is recommended that</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>AGL document the implementation of control measures for project loading and unloading activities.</p>
AQ3	<p>While hauling materials in trucks, the following will be undertaken:</p> <ul style="list-style-type: none"> • Regular watering of unsealed haulage routes • Regular inspection and removal of debris from plant and equipment to avoid the tracking of materials on to the adjacent road network. 	Construction	NC	<p>The AQMP notes source specific control measures shall be routinely implemented (e.g. water spraying roads for dust suppression of traffic movements). The AQMP also notes that wash down facilities will be made available prior to vehicles leaving site to minimise mud and silt transfer offsite. Further measures may also be included to reduce the impact of mud and silt such as a rattle grid.</p> <p>Viewed pre-start inspection records for a watercart used for the project by FCS, completed in April and May 2023.</p> <p>No evidence was available at the time of the audit to confirm that regular inspection and removal of debris from plant and equipment is occurring for the project.</p> <p>It is recommended that</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>AGL retains evidence regular inspection and removal of debris from plant and equipment is occurring for the project.</p>
AQ4	<p>The following will be undertaken to manage exhaust emissions from plant and equipment:</p> <ul style="list-style-type: none"> • Inspecting all plant and equipment before it is used on-site • Ensuring that all vehicles, plant, and equipment are operated in a proper and efficient manner • Switching off all vehicles, plant and equipment when not in use for extended periods • Avoiding the use of diesel or petrol-powered generators and use mains electricity or battery powered equipment where practicable. 	Construction	C	<p>JM and KS (pers comms) confirmed that pre-start checks for equipment are undertaken before use.</p> <p>The AQMP notes all construction and maintenance equipment and vehicles are to be operated and maintained to the manufacturer's specifications, and be regularly service to minimise exhaust emissions. The AQMP also notes that Engines and equipment should be switched off when not in use and where reasonable and feasible, low emission plant and equipment should be adopted and used on site.</p> <p>The site inspection confirmed that all vehicles, plant and equipment were switched off when not in use for extended periods.</p>
AQ5	<p>Activities will be coordinated between the Project and the WOAOW project to limit the potential for cumulative dust impacts where possible.</p>	Construction	NC	<p>Section 4 of the AQMP notes activities will be coordinated between the</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>Decoupling works and the Bayswater WOAOW Project to limit the potential for cumulative dust impacts where possible. However, evidence was not available at the time of the audit to confirm that management of cumulative dust impacts has been considered between AGL and WOAOW project team.</p> <p>It is recommended that activities are coordinated between the Project and the WOAOW project team to limit the potential for cumulative dust impacts where possible.</p>
AQ6	<p>The following will be undertaken to manage wind erosion from stockpiles and exposed surfaces:</p> <ul style="list-style-type: none"> • Watering stockpiles and exposed surfaces • Progressive rehabilitation of exposed surfaces (as feasible) where no longer required for construction. 	Construction	C	<p>Section 4 of the AQMP notes that stockpiles of soils across the project will be managed to reduce dust emission including spraying with water or covering.</p> <p>Viewed pre-start inspection records for a watercart used for the project by FCS, completed in April and May 2023.</p> <p>No evidence of dust emissions from stockpiles and exposed surfaces was observed during the audit</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				site inspection (see Plate 4 and Plate 10).
Greenhouse gases				
GHG1	The CEMP will include requirements for identification and minimise greenhouse gases (GHG) during construction.	Construction	C	KS (pers comms) confirmed that reduced idling and use of modern / efficient equipment are mitigation measures to minimise GHG during construction. Section 4 of the AQMP includes control measures for minimising GHG emissions during construction.
Noise and vibration				
NV1	The CEMP would identify Project construction activities with the potential to have noise impacts and the controls required to avoid, minimise and mitigate these impacts. The standard techniques for controlling noise impacts during construction are presented in the Interim Construction Noise Guideline (ICNG). During construction relevant standard measures as outlined in Section 6 of the ICNG will be implemented.	Construction	C	Sighted copy of the Liddell Decoupling Works - Construction Noise Management Plan (NMP) dated 22 August 2022. Section 5 of the NMP provides details of the mitigation and management measures proposed to address potential noise impacts resulting from the project. Section 3.1 of the NMP notes that the ICNG was used to determine construction Noise Management Levels for the project which are to act as noise criteria for the

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				construction and decommissioning phase of works.
Traffic and transport				
TT1	<p>The haulage contractor will prepare and implement a Construction Traffic Management Plan (CTMP) for oversized overmass vehicle movements, which will include:</p> <ul style="list-style-type: none"> • Identification of the routes • Measures to provide an escort for the loads • Times of transporting to minimise impacts on the road network • Communication of strategy and liaising with emergency services and police. 	Pre-construction and construction	NC	<p>Sighted Liddell Decoupling Works - Traffic Management Plan dated 22 August 2022 which provides an oversized overmass vehicle route map.</p> <p>The Traffic Management Plan notes that the haulage contractor will prepare and implement a CTMP for oversized overmass vehicle movements, which was not available at the time of the audit.</p> <p>It is recommended that the haulage contractor prepares and implements a Construction Traffic Management Plan (CTMP) for oversized overmass vehicle movements associated with the project.</p>
TT2	An oversized vehicle permit will be sought for all oversized overmass (OSOM) movements where required. The OSOM movements would be in accordance with the permit requirements and be outside of peak traffic periods where possible.	Pre-construction and construction	NC	<p>Copies of oversized vehicle permits were not available at the time of the audit.</p> <p>It is recommended that an oversized vehicle permit will be sought for all OSOM movements where required.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
TT3	The CEMP and general site induction will inform construction and operational personnel of the risk of collisions, particularly with animals during rain or periods of low light.	Pre-construction and construction	C	JM (pers comms) confirmed that the site induction for construction and operational personnel informs of the risk of collisions and includes a 40 km site speed limit. The AGL Liddell Environmental Management Strategy (EMS) dated 22 August 2022, notes that speed limits within the Project area would be limited to 40 km/hr to minimise the risk of vehicle collision with fauna.
Biodiversity				
BIO	Future detailed design phase will increase retainment of native vegetation.	Pre-construction	NT	JM and KS (pers comms) confirmed that this is not relevant at this stage of project.
BIO1	Exclusion zones, or 'No-Go' zones, will be mapped in CEMP and mapping made available to all construction personnel.	Pre-construction	C	JM (pers comms) confirmed that the location of No-Go zones are communicated during site inductions. The EMS also notes that mitigation measures including the installation of appropriate signage such as 'No Go Zone' or 'Environmental Protection Area' will be implemented. The site inspection confirmed that flagging is

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>being used to identify the project construction boundary and 'No-Go' zones have been implemented, see Plate 4 and Plate 5, however no records of completed site inductions were available at the time of the audit to confirm these had been communicated to all construction personnel. It is recommended that copies of completed site inductions which communicate the location of any 'No Go Zones' are retained.</p>
BIO2	Woody debris (logs and mulch) produced during vegetation clearing will be re-spread over any cleared areas to protect the soil surface from erosion and to aid habitat restoration where appropriate.	During construction	NT	JM (pers comms) confirmed that native vegetation clearing has not occurred during the audit period.
BIO3	<p>An inspection of native vegetation to be impacted (within the construction footprint) will be conducted by an ecologist immediately prior to vegetation clearing works (to confirm absence of fauna species). A Spotter/Catcher ecologist must supervise vegetation clearing. In the unlikely event that fauna is present, works will cease until animals can be captured and removed from the construction footprint. Construction crews will be made aware that any native fauna species encountered must be allowed to leave site without being harassed.</p> <p>Trenches / holes will be inspected each morning and any trapped fauna removed or provide a mechanism for fauna to escape.</p>	Immediately prior to vegetation clearing / During construction	NT	JM and KS (pers comms) confirmed that this is not relevant as Stage 1 of the project does not involve any clearing of native vegetation.
BIO4	Vehicle movements on newly formed access tracks or construction zones will be limited to 20km/h speed limit to reduce the risk of vehicle strike to fauna.	During construction	NT	JM (pers comms) confirmed that there are no newly formed access tracks for the

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				project. No new access tracks were sighted during site inspection.
BIO5	Where native vegetation is removed topsoil is to be retained from excavation areas within construction footprint (where possible). Topsoil stockpiles will be delineated and protected from machinery compaction and contamination during construction. Following construction and infill, topsoil will be re-spread over impacted native vegetation areas (to retain native seedbank and assist with natural revegetation). Avoid stockpiling in the vicinity of drainage lines.	During construction	NT	JM (pers comms) confirmed that this is not relevant to the stage of the project.
BIO6	Accurately and clearly mark out the limits of the construction footprint (only where native vegetation exists). No activities including parking and turning of vehicles and plant/ equipment will occur beyond the construction footprint. The Construction footprint will be demarcated prior to commencement of works in areas where native vegetation exists.	During construction	C	The audit site inspection confirmed that flagging has been used to clearly mark out the limits of the construction footprint, see Plate 4.
BIO7	Materials, plant, equipment, work vehicles and soil/rock stockpiles to be placed to avoid damage to surrounding vegetation and will be outside tree drip-lines. Construction workers and vehicles will not access areas beyond delineated construction footprints.	During construction	C	The EMS notes that materials, plant, equipment, work vehicles and soil/rock stockpiles will be placed to avoid damage to surrounding vegetation and outside tree drip-lines. Construction workers and vehicles will not access areas beyond the delineated development site. The audit site inspection confirmed that flagging has been used to clearly mark out the limits of the construction footprint, see Plate 4. No construction workers or

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				vehicles were identified in areas beyond delineated construction footprint during the audit site inspection.
BIO8	Where possible, avoid entering areas of significant weed infestations with machinery or personnel. Weed infestations are predominantly located in the Exotic grassland areas, or the PCT 1691 'regrowth' areas mapped within the development site (Figure 5-2).	During construction	NC	<p>No evidence was available at the time of the audit that confirmed machinery or personnel avoid entering areas of significant weed infestations.</p> <p>It is recommended that AGL ensures that where possible, machinery or personnel avoid entering areas of significant weed infestations.</p>
BIO9	<p>If required, weed control will be undertaken by suitably qualified and/or experienced personnel. This may include:</p> <ul style="list-style-type: none"> • Manual weed removal in preference to herbicides. • Replacing non-target species removed/killed as a result of weed control activities. • Protecting Non-target species from spray drift. • Using only herbicides registered for use within or near waterways for the specific target weed. • Not applying herbicide if it is raining or if rain is expected. • Mixing and loading herbicides and cleaning equipment away from waterways and drains. • The CEMP will detail the procedures for management of weeds on the development site (which will be in accordance with the requirements of the Biosecurity Act 2015). 	Pre-construction or during construction	NC	<p>JM (pers comms) confirmed that weed control for the AGL site is managed under contract.</p> <p>The EMS notes that weed control will be undertaken by suitably qualified and / or experienced personnel as required. However evidence of weed control for the project was not available at the time of the audit.</p> <p>It is recommended that any weed control for the project is undertaken by suitably qualified and/or experienced personnel and</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
BIO10	During the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species.	During construction	NC	<p>records are retained.</p> <p>Evidence of weed disposal and management was not available at the time of the audit.</p> <p>The EMS notes that the CEMP will detail the procedures for management of weeds on the development site, however a copy of the CEMP was not available at the time of the audit.</p> <p>It is recommended that during the clearing works, weeds will be disposed and managed appropriately to stop the spread of existing weed species and records are retained.</p>
BIO11	Ensure vehicle and machinery hygiene measures are applied during construction and operation. Vehicle washdowns may be required for removal of mud and plant materials.	During construction	NC	<p>The AQMP notes wash down facilities will be made available prior to vehicles leaving site to minimise mud and silt transfer offsite. Further measures may also be included to reduce the impact of mud and silt such as a rattle grid. However, evidence was not available at the time of the audit to confirm that vehicle and machinery hygiene measures have been</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>applied during construction.</p> <p>It is recommended that AGL ensures vehicle and machinery hygiene measures are applied during construction and records retained.</p>
BIO12	<p>Pathogen management measures will be implemented to prevent introduction and spread of amphibian chytrid fungus, <i>Phytophthora cinnamomi</i> and Exotic Rust Fungi. The CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases.</p>	<p>During construction</p>	<p>NC</p>	<p>The EMS notes pathogen management measures will be established to prevent introduction and spread of amphibian chytrid fungus, <i>Phytophthora cinnamomi</i> and Exotic Rust Fungi. The EMS notes the CEMP will provide a protocol for construction vehicles driving to and from site to prevent the spread or introduction diseases, however a copy of the CEMP was not available at the time of the audit.</p> <p>It is recommended that project documentation is updated to include a protocol for construction vehicles driving to and from site to prevent the spread or introduction pathogens on site.</p>
BIO13	<p>Avoid excessive noise and vibration during construction activity. Construction activities to be carried out during diurnal hours.</p>	<p>During construction</p>	<p>C</p>	<p>No excessive noise or vibration was identified</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>during the audit site inspection.</p> <p>The audit site inspection confirmed that plant and equipment were switched off when not in use.</p> <p>JM (pers comms) confirmed that work is limited to standard hours of construction.</p> <p>JM (pers comms) confirmed that there has been no complaints received during the audit period in relation to noise and vibration.</p> <p>Section 5 of the NMP provides details of the mitigation and management measures proposed to address potential noise impacts resulting from the Project.</p>
BIO14	Erosion and sediment controls will remain in place until all rehabilitation has been completed. Drainage lines will be protected from runoff and stockpiling of spoil.	During construction	C	The audit site inspection confirmed that erosion and sediment controls are in place at the project site.
BIO15	Revegetation of slopes or exposed soil areas will be undertaken as soon as possible, in accordance with the CEMP. Landscaping of exposed surfaces using native indigenous species only. Soil loss will be prevented by immediate stabilisation of exposed surfaces (e.g. use of Jute mesh and/or soil binder).	During construction / post construction	NT	KS and JM (pers comms) stated revegetation of slopes or exposed soil areas is not required for Stage 1 of the project. No rehabilitation has occurred during the audit period.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
BIO16	Future detailed design phase will enhance retainment of native vegetation. Patches of native vegetation which are located near larger patches of native vegetation will be prioritised for retainment.	Pre-construction	NT	JM (pers comms) confirmed that there are no patches of remnant vegetation in proximity to construction work undertaken during the audit period.
Land and contamination				
Lo1	The internal bunding and environmental controls for hazardous substances management suitable for the Battery and transformers will be in accordance with applicable guidelines.	Detailed design	NT	JM (pers comms) confirmed that this is not relevant to the current stage of the project.
Lo2	<p>Potential contamination-related impacts associated with the Project will be managed by the implementation of a CEMP that includes (but not limited to):</p> <ul style="list-style-type: none"> • An unexpected finds protocol for the appropriate assessment and management of encountered contamination to mitigate impacts to the development • Procedures to ensure that all material excavated during the construction of the development is appropriately assessed and classified before being disposed of in accordance with environmental laws • Specific control measures to mitigate impacts to soil, water, air, noise, traffic, structures and clear protocols for measurement of affected media and validation of results during construction of the development. 	Construction	C	<p>The EMS notes the strategy for managing potential contamination related impacts for the project is provided in the Contamination Management Subplan.</p> <p>Sighted Liddell Decoupling Works - Contamination Management Plan dated 22 August 2022 which provides an accidental discovery protocol for Unexpected Finds.</p> <p>Section 5.3 of the Contamination Management Plan also notes where potential contamination finds are not applicable for potential reuse as backfill they will be classified and disposed of at</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>a lawful place in accordance with the <i>NSW EPA Waste Classification Guidelines 2014</i> and the <i>Liddell Battery Decoupling Works Waste Management Plan</i>.</p> <p>Section 5.1 of the Contamination Management Plan provides specific contamination control measures.</p>
Lo3	<p>The Asbestos Management Procedure would be updated as required to provide appropriate control measures during the construction phase (as well as the operational phase if maintenance activities are required) to mitigate any risks of worker exposure to airborne asbestos fibers during work activities.</p>	Construction / operation	C	<p>Viewed a copy of the AGL Asbestos Management Procedure, AGLM-HSE-PRO-007.10.01 which outlines responsibilities, procedures/ protocols and systems for effective management of asbestos and asbestos containing material and the minimisation of health risks associated with the presence of asbestos.</p> <p>Next review date for the Asbestos Management Procedure is noted as 20 August 2023.</p>
Lo4	<p>Detailed design of each Project component would consider and address geotechnical stability risks in accordance with applicable design standards.</p>	Detailed design	C	<p>Viewed the Geotechnical Investigation – Liddell Power Station dated 11 March 2022, prepared by Construction Sciences. The Construction Sciences report</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				assesses the project site and provides geotechnical recommendations.
Aboriginal heritage				
AH1	A Cultural Heritage Management Plan (CHMP) will be developed. It will include the methodologies developed in the ACHAR (Section 11.1, 11.2 and 11.3 of the ACHAR). It will specify that Project works will be restricted to the disturbance site. It will include provisions to ensure workers are made aware of cultural heritage places and their value, for example through Project inductions. The CHMP will include provisions to guard against indirect impact to the Aboriginal sites near the development site. The CHMP will also include a detailed methodology for the salvage and long-term management of any Aboriginal objects that may be impacted by the proposed works.	Pre-construction	C	<p>Sighted Liddell Power Station Decoupling Works Aboriginal Cultural Heritage Management Plan (ACHMP) dated 22 August 2022.</p> <p>Section 3.7 of the ACHMP notes that the construction footprint will be demarcated or communicated to contractors to ensure no disturbance outside of the approved area.</p> <p>JM (pers comms) confirmed that site inductions cover Aboriginal cultural heritage management.</p> <p>Section 8.0 of the ACHMP notes generic Aboriginal cultural heritage management training is provided to all employees and contractors through the site induction process at Liddell Power Station.</p> <p>Employees and contractors will also be made aware of their legal responsibilities under the NP&W Act 1974.</p> <p>JM (pers comms) confirmed that other known sites are a</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>sufficient distance away from the ACHMP area so as not to represent an impact risk.</p> <p>Section 3.7 of the ACHMP notes that a number of Aboriginal sites are located outside the ACHMP area but within the Liddell Power Station site. These sites are not to be impacted as part of the decoupling component of the Project. Management of these sites will be included in separate ACHMPs developed for other components of the project.</p> <p>The audit site inspection confirmed flagging is used to identify the project boundary and ensure no disturbance outside of the approved area, see Plate 4 and Plate 5.</p>
AH2	<p>If repair or maintenance works on the Liddell to Jerrys Plains High Pressure Pipeline are required, the area of works will be subject to surface collection in accordance with Section 11 of the ACHAR (Appendix F) of impacted sites. The sites that maybe impacted include:</p> <ul style="list-style-type: none"> • Liddell Jerrys Plains Pipeline AS1 (37-2-6280) • Liddell Jerrys Plains Pipeline IF2 (37-2-6281) • Liddell Jerrys Plains Pipeline AS3 (37-2-6279) • Liddell Jerrys Plains Pipeline IF4 (37-2-6291) • Liddell Jerrys Plains Pipeline AS5 (37-2-6290) 	Pre-construction	NT	<p>JM (pers comms) confirmed that maintenance works on the Liddell to Jerrys Plains High Pressure Pipeline are not relevant to this stage of the project.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	<ul style="list-style-type: none"> Liddell Jerrys Plains Pipeline AS6 (37-2-6289) Liddell Jerrys Plains Pipeline IF7 (37-2-6287) Liddell Jerrys Plains Pipeline IF8 (37-2-6288) Liddell Jerrys Plains Pipeline AS9 (37-2-6286) Liddell Jerrys Plains Pipeline AS10 BAYS ASo6 (37-2-6145). <p>If no works are required in the vicinity of a site, the site will be conserved.</p>			
AH3	<p>If practicable, the design and construction of the Brine Pipeline will avoid the two recorded site areas (Liddell Pipeline AS1 (37-2-6285) and Liddell Pipeline AS2 (37-2-6282)).</p> <p>The sites will be protected with high visibility fencing. If impact cannot be avoided, the sites will be salvaged through surface collection.</p>	Design, pre-construction, construction	NT	JM (pers comms) confirmed that the design and construction of the Brine Pipeline is not relevant to this stage of the project.
AH4	<p>During any works on the Liddell M1 Conveyor the site (Liddell M1 Conveyor AS1 (37-2-6284)) will be conserved and protected by high visibility exclusion fencing to prevent impact.</p>	Construction	NT	JM (pers comms) confirmed that works on the Liddell M1 Conveyor are not relevant to this stage of the project.
AH5	<p>The Unanticipated Finds Protocol in the ACHAR will be followed for any previously unidentified Aboriginal heritage objects found during the works.</p>	Construction and operation	NT	<p>JM (pers comms) confirmed that there has been no unidentified Aboriginal heritage objects found during the audit period.</p> <p>Section 3.3 of the ACHMP describes the Unanticipated Finds Protocol.</p>
Non-Aboriginal heritage				
NAH1	<p>Should any historical archaeological remains be discovered during construction, all works will stop, the area cordoned off and a heritage professional engaged to examine and advise on the significance of the archaeological finds.</p> <p>If deemed to be of significance, under section 146 (s146) of the Heritage Act, a s146 form would be submitted to notify the Heritage Council of the discovery of relics. Further investigation may be required, and appropriate management will be agreed through consultation with Heritage</p>	Construction	NT	JM (pers comms) confirmed that there has been no historical archaeological remains discovered during the audit period.

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
	NSW.			
NAH2	<p>In the unlikely event that human remains are uncovered, all work must cease immediately in the vicinity of the remains and the area cordoned off. The local NSW Police must be notified, who would make an initial assessment as to whether the remains are part of a crime scene, or Aboriginal remains.</p> <p>If the remains are thought to be Aboriginal, Heritage NSW must be contacted as per AH4.</p>	Construction	NT	<p>JM (pers comms) confirmed that no human remains have been uncovered during the audit period.</p> <p>Section 3.3.2 of the ACHMP describes the unanticipated finds protocol for human skeletal remains.</p>
Landscape character and visual				
V1	Retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible.	Design	NC	<p>Detailed designs for the project were not available at the time of the audit to confirm that retention and enhancement of existing landscape features (areas of scrub, individual trees) was considered.</p> <p>It is recommended that AGL retain copies of detailed designs for the project that confirms retention and enhancement of existing landscape features.</p> <p>The EMS notes the visual and lighting mitigation measures including the retention and enhancement of existing landscape features (areas of scrub, individual trees) will be considered where feasible.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
V2	<p>Colour of proposed structures and built form will be considered in a suitable muted palette to visually integrate the Project within the landscape where possible.</p> <p>Where a muted palette is not possible, such as for the battery enclosures, AGLM will consider the use of vegetation screen instead.</p>	Design	NC	<p>Detailed designs that confirm colour proposed for permanent infrastructure were not available at the time of the audit.</p> <p>It is recommended that AGL retain copies of Detailed designs that confirm colour proposed for permanent infrastructure.</p> <p>The EMS notes the visual and lighting mitigation measures including the colour of proposed structures and built form will be considered in a suitable muted palette to visually integrate the Project within the landscape where possible.</p>
V3	<p>Where possible, consider minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare.</p>	Design	NC	<p>Detailed designs that confirm the consideration of minimal use of reflective surfaces was not available at the time of the audit.</p> <p>It is recommended that AGL retain copies of detail design documents to confirm the consideration of minimal use of reflective surfaces in project infrastructure.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				The EMS notes visual and lighting mitigation measures including where possible, considering minimal use of reflective surfaces to avoid drawing attention to the site within views due to reflective glare.
V4	Limit the area of disturbance during construction where possible.	Construction	C	<p>The EMS notes the management and mitigation measure of limiting the area of disturbance during construction where possible. The EMS also notes that there will be no vegetation clearance outside of disturbance area outlined in EIS.</p> <p>The audit site inspection confirmed flagging is used to identify the project boundary and ensure no disturbance outside of the approved area, see Plate 4.</p>
V5	Mitigation tree and shrub planting will be considered to visually integrate the Project within the surrounding landscape.	Construction	NT	<p>The EMS states that mitigation tree and shrub planting will be considered to visually integrate the project within the surrounding landscape. No supplementary tree plantings occurred during the audit period.</p> <p>It is recommended that</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>AGL consider mitigation tree and shrub planting to visually integrate the Project within the surrounding landscape and document the findings of this review.</p>
V6	<ul style="list-style-type: none"> • All construction plant, equipment, waste and excess materials will be contained within the designated boundaries of the work site and will be removed from the site following the completion of construction • Stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality • On completion of the work disturbed areas will be stabilised and rehabilitated. 	Construction	C	<p>The site inspection confirmed that all construction plant, equipment, waste and excess materials are being contained within the designated boundaries of the project construction area, see Plate 6.</p> <p>The EMS notes stockpiles will be stabilised to prevent erosion by wind and water and avoid the development of dust plumes adversely impacting air and visual quality. The Strategy also notes that on completion of the work disturbed areas will be stabilised and rehabilitated.</p> <p>No dust plumes were identified during the audit site inspection (see Plate 4 and Plate 10).</p> <p>The AQMP notes stockpiles of soils across the project will be managed to reduce</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				dust emission including spraying with water or covering. Viewed pre-start inspection records for a watercart used for the project by FCS, completed in April and May 2023. It is recommended that AGL retains records of water used for project dust suppression.
Waste				
WRo1	A Waste Management Plan will be developed for the Project with the following criteria: <ul style="list-style-type: none"> • A hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable (disposal) to prioritise waste management strategies to avoid waste generation • The plans will promote the use of materials with minimal packaging requirements, removal of packaging offsite by suppliers and fabrication of parts offsite • Where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors • All waste types will be separated at source for recycling • A licensed service provider will be appointed to collect waste during construction and operation • Each waste type will be classified for transport to ensure correct handling. • Any waste that cannot be recovered or recycled will be disposed of at a suitably authorised or licensed treatment or disposal facility where it will be treated and disposed of according to its classification.	Detailed design	C	Sighted Liddell Decoupling Works - Waste Management Plan dated 22 August 2022. Section 3.3 of the Waste Management Plan notes a hierarchical waste management approach will be used, from the most preferable (reduce, reuse or recycle wastes) to the least preferable (disposal) to prioritise waste management strategies to avoid waste generation. Section 3.3 of the Waste Management Plan notes materials with minimal packaging requirements should be used, removal of packaging should occur offsite by suppliers, and fabrication of parts should

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>be conducted offsite.</p> <p>Section 3.3 of the Waste Management Plan notes where waste cannot be avoided, waste materials will be segregated by type for collection and removal (for processing or disposal) by licensed contractors.</p> <p>Section 3.3 of the Waste Management Plan notes all waste types are to be separated at the source for recycling.</p> <p>The audit site inspection confirmed that segregated waste skip bins are available on site, site Plate 6.</p> <p>Section 3.3 of the Waste Management Plan notes that:</p> <ul style="list-style-type: none"> • A licenced service provider will be appointed to collect waste during construction and operation. • Each waste type will be classified for transport to ensure correct handling. • Any waste that cannot be recovered or recycled will be disposed of to a suitably authorised or

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>licensed treatment or disposal facility where it will be treated and disposed of according to its classification.</p> <p>JM (pers comms) confirmed project waste is removed from site by Remondis and taken to a licenced facility. Viewed examples of March 2023 receipts to AGL from the Muswellbrook Waste and Recycling Facility, confirming receipt of project waste.</p>
WR02	Cleared vegetation will be either mulched for onsite reuse or used to created habitat piles, noting that any weeds and pathogens will be managed according to requirements under the NSW <i>Biosecurity Act 2015</i> .	Construction	NT	JM (pers comms) confirmed that there has been no vegetation clearing during the audit period.
Water (surface water and groundwater)				
W1	The specific requirements for water quality controls will be confirmed as the detailed design develops and prior to commencement of construction of each Project component, to ensure the objectives of the Project are achieved.	Pre-construction	C	<p>Sighted Liddell Decoupling Works - Soil and Water Management Plan dated 22 August 2022.</p> <p>Section 4.2.1 of the Soil and Water Management Plan describes the potential impacts to water quality during construction.</p> <p>Section 5.1 of the Soil and Water Management Plan describes water control measures.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>JM (pers comms) confirmed that no discharges have occurred on site and sediment controls have been implemented for development work.</p> <p>The site inspection confirmed that water quality control measures are in place, see Plate 5 and Plate 10.</p>
W2	<p>The following measures will be undertaken to manage activities in proximity to waterways:</p> <ul style="list-style-type: none"> • The design and implementation of works within waterfront land would be undertaken in accordance with Guidelines for Controlled Activities on Waterfront Land (NRAR, 2018) • Implementing practices to minimise disturbance of banks and undertake bank stabilization • Appropriate drainage features will be incorporated into the design of the Project components by a suitably qualified and experienced professional. All Project components will be designed and constructed in accordance with relevant guidelines. 	Pre-construction and construction	NT	<p>KS and JM (pers comms) confirmed that construction work undertaken during the audit period has not been undertaken in proximity to natural drainage lines or waterways.</p>
W3	<p>Stockpiles would be managed to minimise the potential for mobilisation and transport of dust, sediment and leachate in runoff. This would include:</p> <ul style="list-style-type: none"> • Minimising the number of stockpiles, area used for stockpiles, and time that they are left exposed • Locating stockpiles away from drainage lines, waterways and areas where they may be susceptible to wind erosion • Stabilising stockpiles, establishing appropriate sediment controls and suppressing dust as required. 	Construction	C	<p>JM (pers comms) confirmed that no additional stockpiles are required for Stage 1 of the project.</p> <p>Sighted copy of the PBE Site Management Plan dated October 2022 which notes where possible any surface run-off will be diverted away from disturbed soil & stockpiles and ensure location of spoil is away from drainage lines with installed sediment fencing on the down slope of</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				<p>stockpiles, re-use topsoil where possible and stockpile separately.</p> <p>The site audit confirmed that erosion and sediment controls are in place for temporary stockpiles, see Plate 5 and Plate 10.</p>
W4	<p>Erosion and sediment control measures will be implemented and maintained at all work sites in accordance with the principles and requirements in Managing Urban Stormwater – Soils and Construction, Volume 1 (Landcom, 2004) and Volume 2D commonly referred to as the “Blue Book” where appropriate. Additionally, any water collected from worksites will be treated and discharged (where able) to avoid any potential contamination or local storm water impacts. Measures will be designed in accordance with the relevant guideline where appropriate.</p>	Construction	C	<p>The site inspection confirmed that sediment and erosion control measures have been implemented and are being maintained within project construction areas, see Plate 5 and Plate 10.</p>
W5	<p>Water use during construction will be minimised where possible and measures to reduce water use will be applied.</p>	Construction	C	<p>JM (pers comms) confirmed that there is no major water demand for this stage of the project.</p> <p>Section 4.2.1 of the Liddell Decoupling Works - Soil and Water Management Plan notes that during construction, water would be required for activities such as dust suppression, drilling, concrete works and revegetation. Water would be sourced from existing onsite sources in accordance with existing water allocations. No new potable water connections would be</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				required, and no surface water would be abstracted during construction of the project.
W6	The Bayswater site operational water quality monitoring program will be updated and implemented as required.	Pre-operation and operation	C	<p>The EMS notes that surface discharges must comply with volume and quality limits set in the site Environment Protection Licence.</p> <p>Sighted monthly data summary for the monitoring period of June 2022 which notes there were no non-compliances identified with EPL conditions.</p> <p>Sighted monthly data summary for the monitoring period of August 2022 which notes there were no non-compliances identified with EPL conditions.</p>
Social and economic				
SE1	AGLM will keep the community and stakeholders updated on the Project via the existing community engagement forum and AGL website	Pre-construction	C	<p>JM (pers comms) confirmed that the community and stakeholders are updated on the project via Community Dialogue meetings.</p> <p>The AGL website provides a project overview and copies of environmental approvals and management documents.</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
SE2	Identify opportunities to maximise the use of local suppliers, labour and businesses in the provision of goods and services for construction.	Construction	C	JM (pers comms) confirmed that AGL use local sub-contractors to perform project work.
SE3	Consultation with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.	Construction	NC	<p>Evidence was not available at the time of audit to confirm that consultation has occurred with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.</p> <p>It is recommended that AGL consults with local tourist accommodation providers to identify peak tourist periods and consider timing of these periods in the planning of non-time-critical construction activities.</p>
Infrastructure				
I1	AGLM will continue to consult with TransGrid and ETMC regarding any perceived impacts on the Liddell switchyard.	Pre-construction	C	<p>JM (pers comms) confirmed that AGLM will continue to consult with TransGrid and ETMC regarding any perceived impacts on the Liddell switchyard.</p> <p>AGL subsequently provided the Liddell 330kV Substation</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				Safety in Design Report LD1-600023 dated 12 April 2023, as prepared by TransGrid. The report documents the TransGrid safety in design and risk assessment process for the Liddell Decoupling Project.
I2	AGLM will consult with Ausgrid as the network provider responsible for other onsite supply regarding continued supply.	Pre-construction / construction	NC	<p>No evidence was available at the time of the audit to confirm that AGLM has consulted with Ausgrid regarding continued supply as a result of the project.</p> <p>It is recommended that AGLM document consultation with Ausgrid regarding continued supply.</p>
Cumulative				
CL1	The CEMP will include a process to review and update management measures if any other development commences in proximity to the Project.	Pre-construction	NC	<p>A process to review and update management measures if any other development commences in proximity to the Project is not included in any management plan for the Project.</p> <p>It is recommended that a process to review and update management measures if any other development commences in proximity to the Project</p>

Ref	Environmental management measures	Timing (Jacobs, 2021)	Status	Evidence
				is included within the project EMS.

APPENDIX D
STAKEHOLDER ENGAGEMENT
CORRESPONDENCE

2 May 2023

Our Ref: 23/29530

Dorian Walsh

Lead Auditor

James Bailey & Associates

6/127-129 John Street

Singleton NSW 2330

Dear Mr Walsh

RE: Liddell Battery and Ancillary Works Project Audit 2023 Independent Environmental Audit – Consultation– Singleton Council

I refer to your email request dated 24 April 2023 requesting comment from Council on the Liddell Battery and Ancillary Works Independent Environmental Audit. This letter forms Council's feedback in relation to that request.

The conditions of approval for SSD 8889679, requires the retention of Council imposed conditions as specified in Part D. Council would like to be informed of any contamination that arises due to the implementation of these conditions.

Additionally, the conditions of approval for SSD 8889679, require the Applicant to create and Environmental Management Strategy to keep the community, including the Council, informed of the operation and environmental performance of the development.

Council would expect that the audit will include evidence to support the compliance status of these conditions of approval, and of interest to Council, evidence to support the following:

- Whether the various rehabilitation management and closure planning objectives/ plans/ strategies required under the various consents align to local, regional and State strategic land use planning documents, including whether these documents incorporate final land use outcomes consistent with these strategic land use planning documents.

I would like to thank you for the opportunity to provide comment on scope for the Liddell Battery and Ancillary Works Independent Environmental Audit. Should you have any questions or comments, please contact Benjamin Pogson, Senior Development Planner on 02 6578 7290.

Yours faithfully



Benjamin Pogson

Senior Development Planner

From: [Theresa Folpp](#)
To: [Dorian Walsh](#)
Cc: [Tegan Anne Brown](#); [Sharon Pope](#)
Subject: RE: Liddell Battery and Ancillary Works Project Audit - Consultation
Date: Tuesday, 2 May 2023 3:27:26 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

[WARNING] This email originated from outside of the organisation.

Hi Dorian,

Thank you for the opportunity to provide comment. It is understood that the IEA will cover construction of the Stage 1 Decoupling Works under SSD-8889679. In this regard, could you please provide:

- Confirmation if there is a date for commencement of Stage 2 (Liddell battery energy storage system and associated works) and Stage 3 (Bayswater Ancillary Works and consolidated consents);
- The number of construction employees currently employed;
- Confirmation that the relevant biodiversity credits for Stage 1 Decoupling Works have been offset (see excerpt below from the EMS), including a description of how they were offset;

Stage of Development	PCT 1691 Moderate Credits	PCT 1691 Rehabilitation Credits	PCT 1691 Native Grassland Credits	PCT 1731 Moderate/ Good Credits	PCT 1692 Moderate/ Good Credits	PCT 1071 Moderate Credits	Southern Mytois credits
Battery	-	57 (57)	-	1 (1)	-	-	37 (37)
Decoupling	2	3 (3)	-	-	-	-	2 (2)
BAW	36 (17.5)	126 (71.5)	24 (0)	6 (0)	17 (1.3)	82(0)	157 (32.9)
Total credits	38	186	22	7	17	82	196

- An audit against the visual and lighting management measures as outlined in Table 20 of the EMS;
- Evidence that AGL have “Identified opportunities to maximise the use of local suppliers and businesses in the provision of goods and services” as committed to in Table 22 of the EMS; and
- An audit against the Contamination Management Plan as part of the EMS.
- Note that the link to the complaints register on the AGL website is not working properly
<https://www.agl.com.au/about-agl/how-we-source-energy/agl-macquarie/documents>

Our Director of Environment and Planning (Sharon Pope) is currently away from the office and has not been able to provide input to these comments. Once she is back, and if she has any additional comments, I will forward these through to you ASAP.

Regards,
Theresa



Muswellbrook Shire Council | Theresa Folpp | Development Compliance Officer | Administration Building

T: (02) 6549 3700 | **E:** Theresa.Folpp@muswellbrook.nsw.gov.au | **W:** www.muswellbrook.nsw.gov.au

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Muswellbrook Shire Council ABN 86 864 180 944

APPENDIX E
IEA SITE VISIT AGENDA

AGL Macquarie
Department of Planning & Environment
Independent Environmental Audit

Agenda for Site Visit to be held
Thursday 22 December 2022

Liddell Battery & Bayswater Ancillary Works (SSD 8889679)

INVITEES:

James McNamara (JM)	AGL	Senior Environment Advisor
Todd Harris (TH)	AGL	Senior Project Manager
Keith Simkin (KS)	AGL	Contractor, Environmental Operations
Dorian Walsh (DW)	James Bailey & Associates	Auditor
Tegan Brown (TB)	James Bailey & Associates	Auditor

Table 1
Audit Agenda Items

Time	Description	Location	Attendees
8:00 – 8:30am	Opening Meeting <ul style="list-style-type: none"> • Inductions / housekeeping (JM) • IEA scope and purpose (DW) • Confidentiality arrangements (DW) • IEA process and timing (DW) • Brief overview of site during construction period (AGL) 	Meeting Room	JM, KS, TH, DW, TB
8:30 - 9:30am	Site Inspection <ul style="list-style-type: none"> • Review of environmental controls: <ul style="list-style-type: none"> ○ Amenity management ○ Erosion and sediment controls ○ Heritage management ○ Laydown areas and storages 	Field	JM, TH, KS DW, TB
9:30 -12:00pm	Compliance Review <ul style="list-style-type: none"> • SSD 8889697 • Statement of Commitments • Management Plans 	Meeting Room	JM, TH, KS DW, TB
12:30-1:00pm	Close Out Meeting <ul style="list-style-type: none"> • Overview of preliminary findings 	Meeting Room	JM, KS, TH, DW, TB

Time	Description	Location	Attendees
	<ul style="list-style-type: none">• Outstanding information requirements• Confirmation of process for audit completion		

APPENDIX F
SITE INSPECTION PLATES



Plate 1 Bunded diesel storage area at project laydown area



Plate 2 Chemical Storage Cabinet available at project laydown area

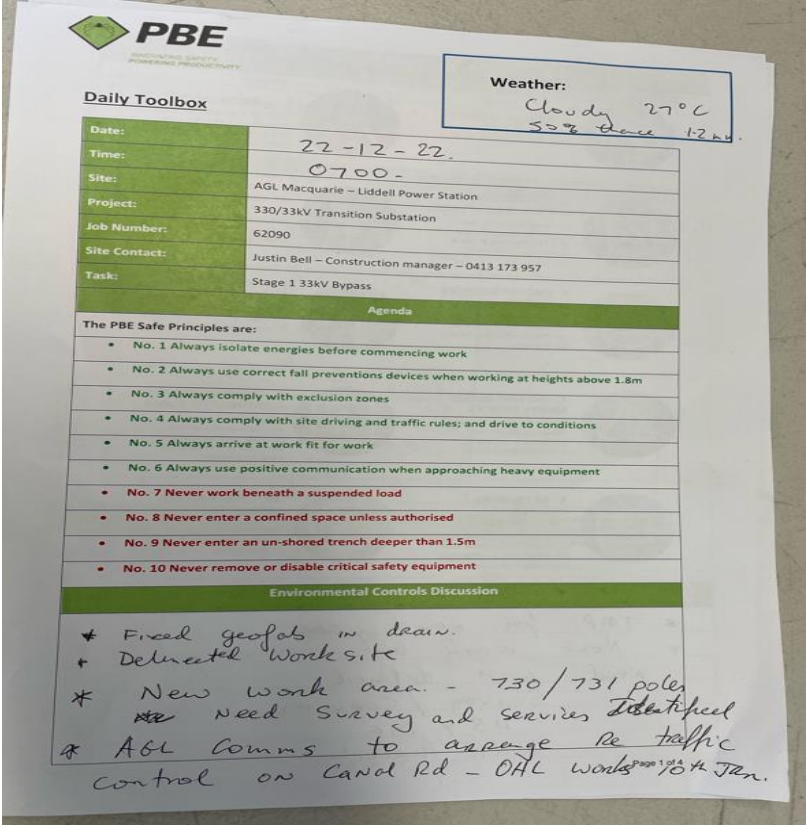


Plate 3 PBE Daily Toolbox Talk



Plate 4 Flagging and sediment fencing in good condition



Plate 5 Sediment mitigation measures in place for the project construction area



Plate 6 Waste skip bins available at the project laydown



Plate 7 Tagged portable fire equipment available at project laydown area



Plate 8 Spill kit available on site

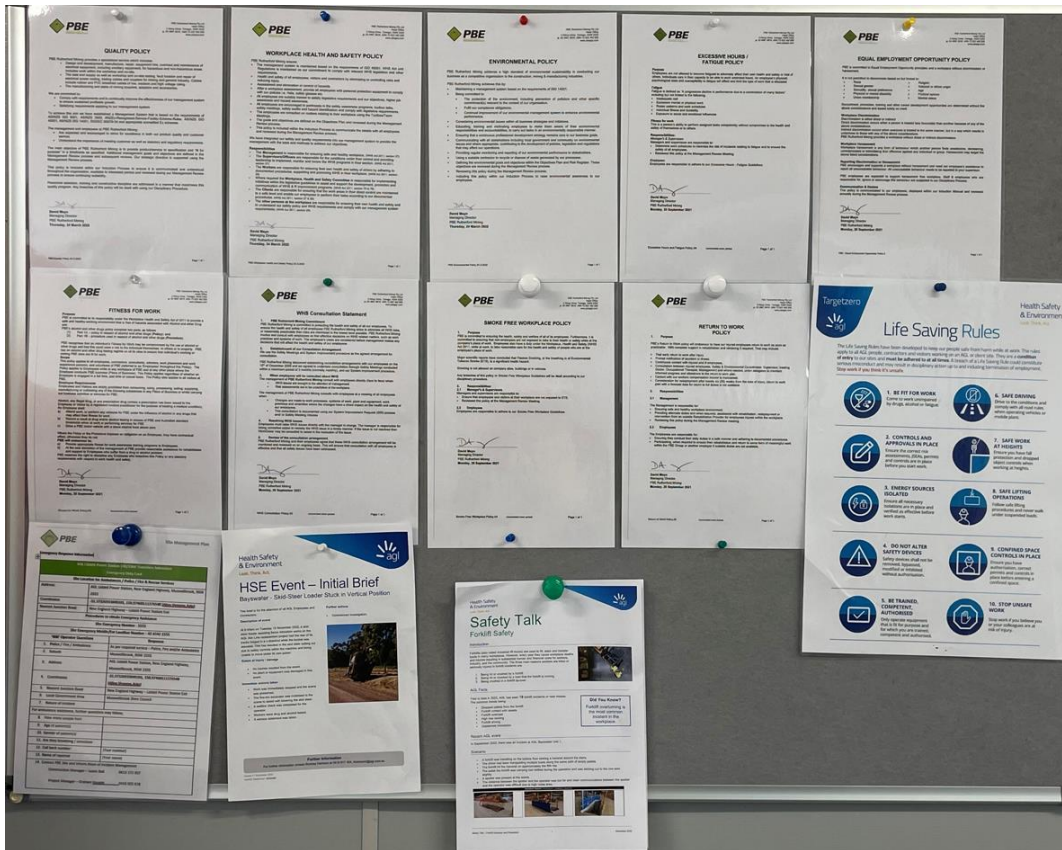


Plate 9 Workplace procedures and safety talks available at project offices



Plate 10 Stockpiles at project construction area with sediment fencing in place